C1

Bray Municipal District,
Wicklow County Council,
Wicklow.

Submission to Development Plan.

Thomas Allen,
Derwent,
8 King Edward Road,
Bray,
Co. Wicklow.

January 14th. 2016

Dear Sirs,

I humbly submit the following :-

Wicklow :- " The Great Eastern Highway" we have enough great towns, country sides and historic places that we could promote, given the political will, to very strongly or better what they offer in the West as "The Wild Atlantic Way". We could ,if necessary, combine with Dublin, Wexford and perhaps Waterford to advertise the East Coast as the birth of Ireland from the historic time of the Norse invasion.

Bray :- Roundabouts need to be introduced at the North and South ends of the town as it takes up to 40 minutes at peak times to negotiate one's way through the town because of traffic lights at either end of the town.

Old Connaught Avenue has traffic lights as has Boghall Road junction. The traffic lights in these areas have long outlived their usefulness.

At the Boghall junction the Newcourt Road needs to be brought around St. Andrew's School to join a roundabout at the end of Boghall Road. We have an ideal opportunity to do so as there is nothing but green grass over the wall at the end of the Boghall Road.

Old Connaught Avenue junction with the main Bray/Dublin Roads has ample space to incorporate a roundabout, there is no amazing feat of engineering needed.

Bray Town :- Footfall is everything, we need people coming into the town. The Florentine Centre badly needs to be completed, it has been prevaricated on for the past 15 years, in order that the "Centre of the Town" be a shopping destination. We do not need a new town centre across the bridge on a flood plain as was approved some years ago.

Car Parks :- Nowadays everybody has a car or two and therefore must be accommodated. We have an ideal opportunity to provide multi-storied car-parks at the Northern and Southern ends of the

WICKLOW COUNTY COUNCIL
15 JAN 2016
PLANNING DEPT.

town and so provide for the future. The Clinic Site, where the Methadone clinic is sited and the Old Folks' Nursing home has been closed, makes an ideal opportunity to provide a multi-storied carpark to the South of the town. The above facilities can easily be accommodated on site.

The Herbert Road car-park begs to be turned into a multi-storied car-park, as was mooted some time ago. It is full to capacity at the moment.

Many towns would be envious of the opportunities that ,at this time, we have to improve our town and bring it back to it's former glory.

Yours sincerely, one who only has the good of the town at heart,

Thomas Allen.

A trader, whose family have traded in Bray since 1850.

C2

ALPHAPLAN DESIGN

ARCHITECTURAL SERVICES

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E Mail: eugene@alphaplandesign.com
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Reg. Vat. No. IE3212037H

RE: County Development Plan 2016 - 2022 submission regarding Objective HD21 and Objective HD20

Dear Sir / Madam,

With regard to the proposals under Objective H21 in the proposed County Development Plan 2016-2022 I wish to state that I am in favour of the wording attached to points 1 and 12.

With regard to the proposed Objective HD21 for housing in the open countryside, while I support this Objective in order to preserve our open rural areas, I feel the lengths that rural applicants must go to are in excess of the requirements of proof of connections to the area.

I have prepared an extensive list of requirements for my clients which includes the family history as well as the applicants history in the area, birth cert, schools attended, membership of local clubs etc, revenue clarification and when these are submitted with a rural planning application they are almost always deemed to be insufficient information. The further information then requested is usually a repeat exercise of the same information that has been lodged already. This leads to a delayed processing of an application and I feel once there is sufficient information lodged in the original application, that item should be ticked as satisfied. The applicants are willing to enter into Section 47 agreements in any case and therefore a further commitment is evident.

With regard to the imposition of a Section 47 for developments in Level 6-9 small villages and settlements I wish to state that while the hamlet developments require a commitment for individual one off dwellings for local people, The villages where there are services and where the applicant must connect to existing sewers and watermains and pay development contributions accordingly and where there are established village communities should not be subject Section 47 restrictions. I believe the Section 47 should only apply to one off dwellings in hamlet areas as there are already occupancy rules in place in village areas where a percentage of dwellings must be for locals only etc.

Please accept this submission and keep me informed of the outcome.

Thanking you,

Yours sincerely,

EUGENE COPELAND
Architect / Project Manager

17th February 2016

C3

Laura Earls

From:	Laura Brock [laura@brockmcclure.ie]
Sent:	19 February 2016 12:00
To:	Planning - Development Plan Review
Subject:	Wicklow Draft County Development Plan - Submission on Behalf Or Ardale Property Group
Attachments:	DevPlanDSub_APG_19022016.pdf

Please find attached submission.

We look forward to confirmation that this has been received.

Regards

Laura Brock

Brock McClure
Planning and Development Consultants
[illegible] York Road,
Dun Laoghaire,
Co. Dublin

Draft Wicklow County Development Plan 2016-2022 Draft Stage

Submission regarding lands at Delgany and Rathnew, Co. Wicklow

On behalf of Ardale Property Group

February 2016

Brock McClure

Planning & Development Consultants

63 York Road, Dún Laoghaire

Co. Dublin

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1 Introduction 2
2 Site Context 3
2.1 Subject Sites 3
2.1.1 *Lands at Delgany* 3
2.1.2 *Lands at Tinakilly Rathnew* 4
2.1.3 *Lands at Rathnew Village* 4
3 **Draft Development Plan - Points of Submission** 6
3.1 Core Strategy 6
3.2 Settlement Strategy 6
3.3 Housing Strategy 7
3.3.1 *Zoning* 7
3.3.2 *Phasing* 7
3.3.3 *Density* 8
3.3.4 *Access* 8
3.4 Retail Strategy 8
3.5 Development and Design Standards 9
4 **Conclusion** 10

1 Introduction

We, Brock McClure, Planning & Development Consultants, 63 York Road, Dun Laoghaire, are instructed by our clients Ardale Property Group, 18F, Main Street, Dundrum, Dublin 14, to make this submission on the provisions of the Draft Wicklow County Development Plan 2016 - 2022, which is currently on public display.

We note that the last day for receipt of submissions is 19 February 2016.

This submission is made with our client's landholdings at Delgany and Rathnew, Co. Wicklow in mind and key provisions from the draft document as they relate to our clients lands are referred to, where appropriate, herein.

The intention of this submission is to set out to the Planning Authority our client's support regarding the core strategy, settlement strategy, housing strategy, retail strategy and also our clients concerns relating to some key objectives and development management standards contained in the Plan.

We trust that the provisions of this submission will now be duly considered going forward in the Plan making process.

2 Site Context

Our clients are key stakeholders in the Draft Plan making process with lands interests at both Rathnew and Delgany.

The various sites are identified below for context purposes and to inform this plan making process.

2.1 Subject Sites

There are 3 sites in which our client has control over with one located at Delgany and two located at Rathnew, Co. Wicklow. A brief site context for each site is detailed below.

2.1.1 Lands at Delgany

The first site is located at the former Wicklow Arms and Public house and consists a site of 0.75 ha comprising the following elements:

- The Wicklow Arms Public House, Restaurant, Off Licence, Café, and associated buildings;
- A large surface car parking area to the rear of the main buildings;
- A group of buildings along the southern boundary of the site, which include a photography studio, an arbitration office; and an office that served the former Wicklow Arms

Figure 1 below identifies the extent of this site.

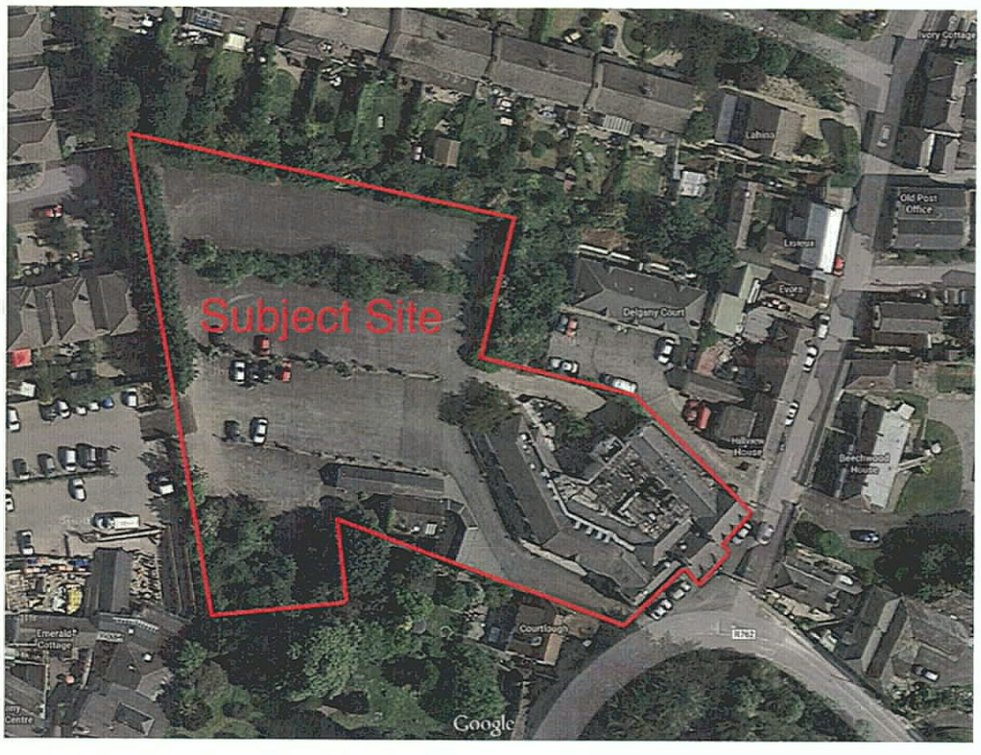

Figure 1 - Site at Delgany

The site is currently accessed to the south of the main Wicklow Arms building via Main Street, Delgany. Bellevue Court is located to the west of the application site and Bellevue Lawns to the north of the site. Delgany Court adjoins the northeast boundary of the site and there exists privately owned lands to the south of the site. The site has direct frontage onto Main Street, Delgany to the east.

2.1.2 Lands at Tinakilly Rathnew

The second site is located at Tinakilly to the north west of Rathnew. The approximate site boundary is identified in Figure 2 below.



Figure 2 - Approximate Site Area

Broad Lough generally bounds the site to the east and the Old village of Rathnew and the Regional Road R750 to the west. There are green-field areas located to the north and south of the landholding.

2.1.3 Lands at Rathnew Village

The third site is located at Rathnew Village, Rathnew, Co. Wicklow and comprises an area of approximately 4.2 ha and is generally located to the north east of Rathnew town.

The site is described as green-field and would appear to be relatively flat in nature with significant planting with trees and vegetation across the site and along the relevant boundaries. There is a stream/river located along the southern boundary of the site and a single storey house located to the west of the site along the R772, which essentially interrupts the regular shape of the site.

The town centre of Rathnew is located approximately 100m to the south of the site and Wicklow town is located approximately 3km to the southeast. Clermont House, a protected structure is situated to the north east of the site.

The overall site is identified in Figure 3 below.



Figure 3 - Aerial Photo with site outlined in Red

3 Draft Development Plan - Points of Submission

The following section sets out the main points of our submission with support generally noted for the core strategy, settlement strategy, housing strategy and retail strategy. Similarly, our client has detailed some concerns regarding specific objectives and some general standards included in the Draft Plan.

We trust that the Planning Authority will have due regard to these issues in considering our submission.

3.1 Core Strategy

Our client welcomes the provisions of the core strategy as detailed in Chapter 2 of the Draft Plan. We note specifically our client's support for the proposed settlement hierarchy, which identifies Wickow/Rathnew as a Large Growth Town 1 in a hinterland area; and Delgany as a Large Growth Town 2 in a Metropolitan area.

The core strategy also provides for the preparation of Local Area Plans for Wicklow-Rathnew and Greystones – Delgany over the period 2017-2019 in order of timeline priority (i.e. according to the date in which each plan is due to expire). It is stated that each plan will cover a period of 6 years and that zoning will be provided on the basis of the land need to meet a 6 - year horizon, plus 3 years zoning headroom or market factor as recommended in the Development Plan guidelines by the Minister.

We trust that this process will advance and that any plans that prepared will have regard to our client's land landholding at both Delgany and Rathnew. For now, our client confirms their support of this provision and we trust that the LAP preparation provision will be carried through to the publication of an adopted plan for the county of Wicklow.

Our client is also supportive of the inclusion of the Core Strategy Map in the Draft Plan, which identifies the Wicklow-Rathnew area and Greystones/Delgany area as principal growth towns providing in turn for large and moderate growth towns.

Overall, our client is satisfied that core strategy has provided for an appropriate planning context for the areas of Delgany and Rathnew.

3.2 Settlement Strategy

Our client is also supportive of the provisions of the settlement strategy in the Wicklow County Draft Development Plan 2016-2022.

We welcome specifically the following provisions in this regard:

- The designation of Wicklow - Rathnew as a Level 2 Large Growth Town 1 and the designation of Geystones - Delgany as a Level 3 Large Growth Town 2.
- Both Rathnew and Delgany are identified as having a distinct identity functioning as a local service centre for its local community.
- Policy SS6, which provides for the preparation of a Local Area Plan for Wicklow-Rathnew and Greystones-Delgany.

We trust that the settlement designations and policy SS6 will be given due weight throughout the plan making process.

3.3 Housing Strategy

Our client is generally satisfied with the provisions of the housing strategy with the exception of some restrictive objectives, which we draw the attention of the Planning Authority to below.

3.3.1 Zoning

Firstly, our client encourages the inclusion of the following provision detailed under Section 4.3.2 entitled Zoning in the Development Plan due for adoption later this year:

> *"The priority for new residential development shall be in designated 'town' and 'village' / 'neighbourhood centres' or 'primary zone' in settlements with development plans, or in the historic centre of large and small villages; through densification of the existing built up area, re-use of derelict or brownfield sites, infill and backland development."*

It is our considered view that that village centre locations should be a priority for new residential development and our client is fundamentally in support of this provision.

3.3.2 Phasing

We are also mindful of Section 4.3.3 entitled Phasing, which contains provision in relating to phasing and population targets as follows:

> *"Notwithstanding the zoning / designation of any land for residential purposes, the development management process shall monitor and implement the population targets for each settlement as set out in the Core Strategy and shall phase and restrict, where necessary, the granting of residential planning permissions to ensure these targets are not exceeded.*
>
> *The development of zoned / designated land should generally be phased in accordance with the sequential approach:*
>
> - *Development shall extend outwards from centres with undeveloped land closest to the centres and public transport routes being given preference, i.e. 'leapfrogging' to peripheral areas shall be resisted;*
> - *a strong emphasis shall be placed on encouraging infill opportunities and better use of under- utilised lands; and*
> - *areas to be developed shall be contiguous to existing developed areas."*

Whilst our client generally welcomes the above provision, we wish to outline that such a provision should not restrict development and rather should provide for development at appropriate locations. It may be the case that Housing Objectives HD6, HD7 and HD8[a], relating to phasing, would be construed as restrictive in nature.

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a

HD6 Notwithstanding the zoning / designation of land for residential purposes, the Development Management process shall monitor and implement the population targets of this plan and shall phase and restrict, where necessary, the granting of residential planning permissions to ensure these targets are not exceeded

HD7 The development of zoned land should generally be phased in accordance with the sequential approach as set out in this chapter. The Council reserves the right to refuse permission for any development that is not consistent with these principles.

HD8 Housing development shall be managed and phased to ensure that infrastructure and in particular, community infrastructure, is provided to match the need of new residents. Where specified by the Planning Authority, new significant residential or mixed use development proposals, may be required to provide a social and community facility/facilities as part of the proposed development or the developer may be required to carry out a social infrastructure audit, to determine if social and community facilities in the area are sufficient to provide for the needs of the future residents. Where deficiencies are identified, proposals will be required to either rectify the deficiency, or suitably restrict or phase the development in accordance with the capacity of existing or planned services.

In this regard, we ask that the Planning Authority review the wording of these objectives to read more favourably in support for housing development at appropriate locations.

3.3.3 Density

Our client is also principally supportive of the provisions of Section 4.3.4 of the Plan, which states that it is an objective of the Council to encourage higher residential densities at suitable locations, particularly close to existing or proposed major transport corridors and nodes, and in proximity to major centres of activity such as town and neighbourhood centres.

Our client also encourages the density provision for infill housing, where it is stated that infill development should generally be at a density that respects the established character of the area. Objective HD10 is therefore acceptable to our client.

3.3.4 Access

We wish to highlight at this point that our client has some concern with Objective HD13 of the Draft Plan, which would appear restrictive in nature. The objective reads as follows:

> *HD13 - New apartment developments dependent on access through existing established areas of predominantly single - family homes will not be permitted.*

It is our considered view that this objective is far too restrictive and should be excluded from the adopted Wicklow County Development Plan 2016-2022. We note specifically that the Planning Authority should have the flexibility to assess each application on a case-by-case basis and should not be constrained in considering potential sites for development based on an objective relating to access.

We trust that the Planning Authority will review the above objective and remove from any plan that progresses.

3.4 Retail Strategy

Our client welcomes the designation of Rathnew as a Level 4 Local Centre/Small Town and of Delgany as a Level 4 Neighbourhood Centre. We confirm our support for the following provisions of the Draft Plan specifically in this regard:

> *"A limited number of sub town core sites in Bray, Greystones, Arklow and Wicklow-Rathnew (particularly in Rathnew), larger foodstores will be permitted, based on their historic use, and the need to service considerable tranches of new housing. The scale of the convenience outlet will be dictated by the overall size of the town, the catchment of the neighbourhood centre and its distance to the town core."*
>
> *"The retail provision in small towns would be expected to be more extensive, including one supermarket / two medium sized convenience stores (up to 1,000sqm aggregate) and perhaps 10-20 smaller shops. These towns can be expected to provide a similar function in terms of providing for the day to day shopping and service needs of the local population. Small towns should be the main service centre in the rural area, providing a range of facilities, shops and services, at a scale appropriate to the needs and size of their catchment."*

In addition, we confirm that our client is generally supportive of the following objectives:

> *"**RT28** Small - scale retail development appropriate to the scale and needs of the settlement and its catchment will be positively considered subject to the following control criteria:*

- *There shall be a clear presumption in favour of central or edge of centre locations for new development, i.e. the traditional historical centre; out of centre locations will not be considered suitable for new retail;*
- *New development shall be designed with the utmost regard to the historical pattern of development in the centre and the prevailing character, with particular regard to building form, height and materials and shall generally be required to incorporate a traditional shop front."*

Overall, our client is satisfied that the provisions of the retail strategy as they relate to lands at Rathnew and Delgany are appropriate.

3.5 Development and Design Standards

Lastly, our client has reviewed the provisions of Appendix 1 - Development and Design Standards and is generally supportive of the provisions of this document. We remind the Planning Authority at this point of the publication of the apartment guidelines in December of 2015 by the Department of Environment, Community and Local Government entitled *'Sustainable Urban Housing: Design Standards for New Apartments – Guidelines for Planning Authorities'.*

We trust that the Planning Authority will ensure that due regard will be given to the new standards contained in the above document as opposed to the 2007 document, which is referenced in places. We trust that the adopted plan will therefore be reflective of any specific requirements in relation to the new development management standards.

Section 1 of this appendix also provides for development management standards for mixed use and housing developments in urban areas. Our client is generally supportive of the key provisions of Section 1. However, we draw the attention of the following to the Planning Authority some key concerns with regard to open space requirements as follows:

- A requirement of a minimum of 30 sq m private open space per apartment is considered unrealistic and should be reduced. This requirement is far too restrictive and we would ask that the Planning Authority have regard to this in their review of open space. We note at this point that we are supportive of the provision of semi-private open space in the form of courtyards, roof gardens etc. within residential schemes, but are of the view that this standard is far to restrictive in nature and should be removed from the Draft Plan.
- The requirement to provide for 50 sq m private open space for 1-2 bed houses and 60-75 sq m for 3-4 bed houses is considered acceptable to our client.
- Our client welcomes the provision to waive public open space requirements of 15% of the site area in town centre locations where the development achieves other overriding aims of the Plan. We would ask that the Planning Authority consider extending this provision to village centre locations also given the need to revitalise village centre sites and the possibility to deliver this without having to deliver restrictive development management standards. It is our considered view that a relaxation in public open space standards would be considered appropriate to village centre locations and specifically the VC zoning. We trust that due regard will be given to this issue on review of this submission.

We trust that the Planning Authority will review the above standards and provide for a more flexible approach in meeting Development Management standards.

Conclusion

This submission has set out the main points of our submission with support generally noted for the core strategy, settlement strategy, housing strategy and retail strategy. Similarly, our client has detailed some concerns regarding specific objectives and some general standards included in the Draft Plan.

We confirm that we act on behalf of the Ardale Property Group and trust that all correspondence in relation to this submission will be directed to our offices.

We trust that the Planning Authority will have due regard to these issues in considering our submission.

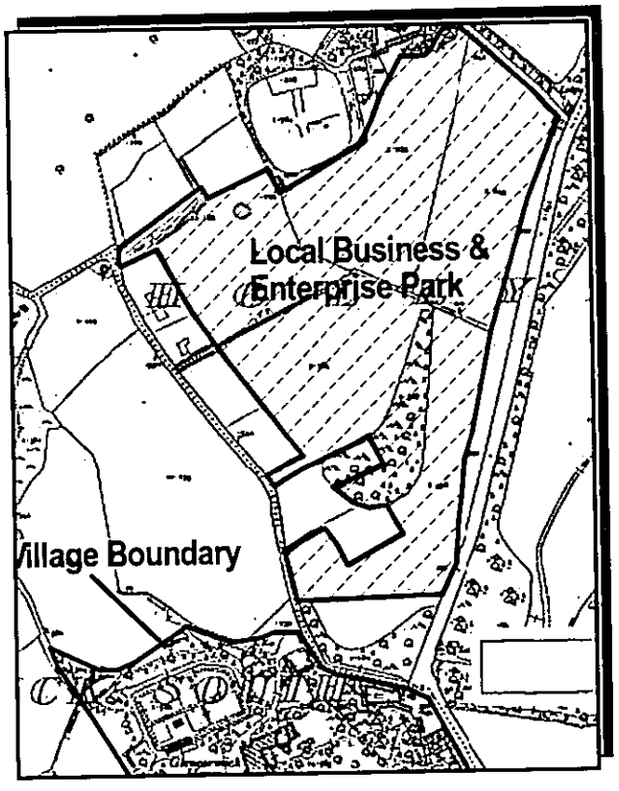
C4

SUBMISSION

DRAFT WICKLOW COUNTY DEVELOPMENT PLAN 2016-2022

ZONING OF HOLLYBROOK, KILMACANOGUE

ARDEA LTD.



February 17th 2016

FRANK O'GALLACHÓIR
& ASSOCIATES LTD.

Professional Town Planning
Consultants

WICKLOW COUNTY COUNCIL
19 FEB 2016
PLANNING DEPT.

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FRANK Ó'GALLACHÓIR
& Associates Ltd.
Planning & Development Consultants

C4

Our Ref: J05/200

County Development Plan Review
Planning Department
Wicklow County Council
County Buildings
Wicklow Town

Date: February 17th 2016

Draft Wicklow County Development Plan Submission
Ardea Ltd. Employment Creation Zoning
Kilmacanogue, Co. Wicklow

Dear Madam,

We act on behalf of Mr. Walter Browne of Ardea Ltd., Lonsdale House, Avoca Avenue, Blackrock, County Dublin, in regard to the Draft Wicklow County Development Plan 2016-2022 – Kilmacanogue Settlement Plan. Our submission follows.

Our client requests the Council to zone his lands as a Secondary Development Area within the settlement boundary of Kilmacanogue with an objective to create employment and to foster local enterprise.

Please contact us if we can be of any further assistance on any of the matters raised. Please address all correspondence to the undersigned.

Yours sincerely,

Frank Ó'Gallachóir

Frank Ó'Gallachóir
Dip. T.C.P., M.Sc., M.I.P.I.

Enc: Development Plan Submission

Enc: Kilmacanogue Proposed Settlement Plan Submission
Map 1 Lands at Hollybrook, Kilmacanogue, County Wicklow.

Company Reg No: 6423170M • VAT No: IE 6423170M • Registered Office: 94 Rathdown Park, Greystones, Co.Wicklow • Directors: Frank Ó'Gallachóir, Kate Uí Ghallachóir

SUBMISSION

PROPOSED KILMACANOGUE SETTLEMENT PLAN
LANDS AT HOLLYBROOK, KILMACANOGUE
COUNTY WICKLOW

ARDEA LIMITED

1. INTRODUCTION & SUBMISSION OBJECTIVE

1.1 Submission Objective

Our client's lands comprise circa 11.6 ha. (28.7 acres), immediately to the north of Kilmacanogue village at Hollybrook, see Map 1. Our client requests the Council to:

Zone his lands as Secondary Development Area within the settlement boundary of Kilmacanogue with an objective to create employment and to foster local enterprise.

It is our client's intention to:

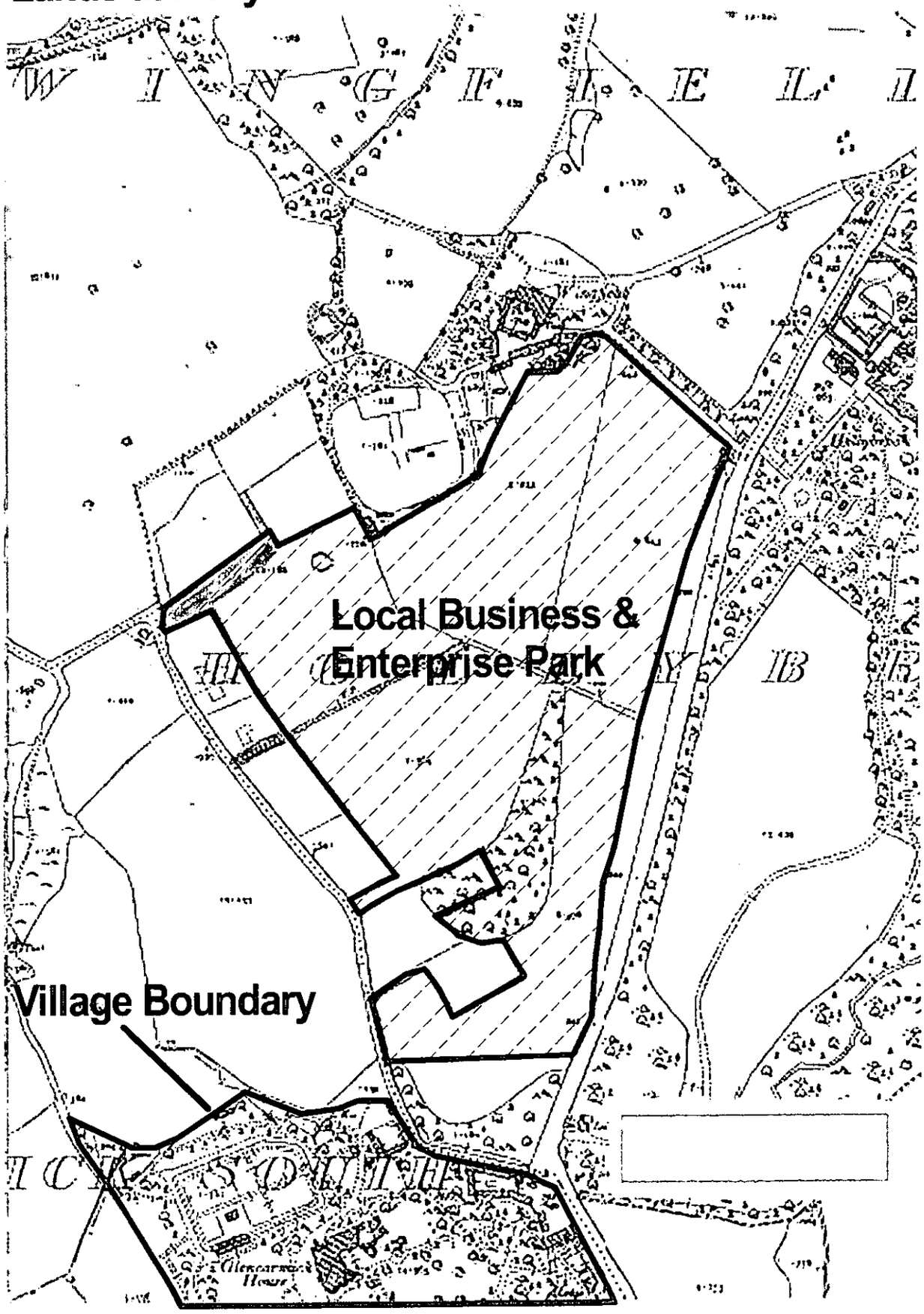
- Provide incubator/start up units for local employers.
- Produce an action area plan for the subject lands to ensure sufficient buffers and boundary treatment from adjacent development and the N11.

1.2 The Subject Lands

The lands are bounded by the N11 to the east and by the Glencormick to Carrigoona local county road to the west. The land is currently in agricultural use. There is a small mature deciduous woodland copse to the centre of the lands. The land is level to undulating and slopes gently from west to east and from north to south. The lands are adjacent to a Wicklow County Council Road's Depot at Jameson's Corner. These Council lands could be incorporated into any development proposed for this area.

There are three access points to the lands from the county road to the west. There is also access from the site to the old county road at Jameson's Corner. The eastern boundary of the lands extends from the existing by-passed section of road at Jameson's Corner to a point close to the vehicular entrance to Wingfield House. The lands are traversed by a high-tension electricity line, which runs generally south to north parallel to the N11.

Map 1 Kilmacanogue Town Plan - Ardea Ltd. Lands at Hollybrook



Not to Scale

These lands have access to the existing public water supply mains and to the public sewerage collection system in the area.

2. WICKLOW POLICY BACKGROUND

The Wicklow policy background is set out in the Draft Wicklow County Development Plan 2016-2022 and in the Proposed Kilmacanogue Settlement Plan.

2.1 2016 Wicklow County Development Plan – Kilmacanogue

The Draft 2016 Wicklow County Development Plan contains the following policies in relation to Kilmacanogue.

- Kilmacanogue is a Level 6 Rural Town in the Draft County Wicklow settlement strategy. It is designated on the same level as Roundwood and Avoca. Policy in relation to these settlements aims to attract local investment, mainly in 'product' intensive industries with some 'people' intensive industries.
- The Draft 2016 Wicklow County Development Plan states that there may be scope for these settlements to capitalize on opportunities to provide tourism infrastructure and to tap into developments based on rural pursuits.
- The Draft County Development Plan states that these settlements are suited to accommodating a significant element of urban generated housing demand, with necessary controls in place to ensure that local demand can also be met.
- The Government's Sustainable Rural Housing Guidelines and the National Spatial Strategy suggest that small towns and villages has much potential in accommodating additional housing development catering for persons working in larger cities and towns, but desiring a rural lifestyle.
- Kilmacanogue is at level 4 in the County Retail Strategy which is the same level as towns such as Roundwood and Enniskerry. However, whereas these other towns have a significant range of shops, there is only one convenience store in Kilmacanogue excluding Avoca Handweavers which is a large speciality and tourist shop.
- The 2006 population of Kilmacanogue was 839 persons which decreased to 799 in 2011. The population projection for the village is 897 persons for 2022.

2.2 2016 Draft Wicklow County Development Plan – Employment Policies in Relation to Level 6 Towns

The following employment objectives in the Draft County Development Plan refer to employment creating developments in settlements such as Kilmacanogue.

Employment objective EMP1 is to *"support all forms of employment creation especially where this can mitigate long distance commuting, subject to the proper planning and sustainable development of the area and compliance with all other objectives of this plan".*

Employment objective EMP2 is to *"normally require new employment generating developments to locate on suitably zoned or identified land in settlements. Proposals in settlements with no zoning plan should be assessed on the basis of their individual merits, taking into consideration the objectives set out in this chapter of the plan and all other matters pertaining to the proper planning and sustainable development of the area, including ensuring that the proposal is appropriately sited in a location so that it enhances, complements, is ancillary to or neutral to the existing land uses in the area".*

Employment objective EMP18 for Small and Medium Enterprises is to " *encourage and facilitate the development of small to medium scale indigenous industries and services at appropriate locations within all Level 1-8 settlements. The Council will require the provision of incubator/starter units in all major planning applications on employment zoned land. The Council acknowledges that the development of small scale projects with long term employment potential are important in sustaining both urban and rural settlements in County Wicklow and as such, the Council will adopt a proactive and flexible approach in dealing with applications on a case-by-case basis".*

2.3 Proposed Kilmacanogue Settlement Plan Policies and Objectives

We note the following conclusions, policies and objectives in the Proposed Kilmacanogue Settlement Plan.

Roads & Transport: *"During the lifetime of this plan, it is the intention of the Planning Authority to examine transport connections between Kilmacanogue and Bray in more detail and explore alternative methods to link Kilmacanogue directly to the Bray environs area and to ensure that the two settlements do not coalesce.*

Water Supply: *The water supply to Kilmacanogue is directly from the trunk main between the Vartry Reservoir and Stillorgan. There is no pumping in the system, the water flows by gravity. There is no storage reservoir for water in the Kilmacanogue area. This is sufficient capacity in this system to serve the growth targets for this settlement.*

Waste Water Treatment: *There is sufficient capacity in the public sewer network and wastewater flows to a pumping station in the town, where it is finally pumped to the Shanganagh Waste Water Treatment Plant via the Bray sewer system. This system has adequate capacity to meet the growth targets of this plan for Kilmacanogue".*

3. SUBMISSION

3.1 Submission Detail

Our client requests the Council to: ***Zone his lands as a Secondary Development Area within the settlement boundary of Kilmacanogue with an objective to create employment and to foster local enterprise.***

3.2 Sustainable Employment Creation in Kilmacanogue

There are no significant undeveloped lands within the Kilmacanogue settlement boundary available for new employment development. Furthermore there are no lands zoned for new employment creating developments within the existing settlement boundary.

It is noted that there is no plan objective to increase the range and availability of local employment for people in Kilmacanogue. This is quite different from the development objectives of the Laragh and Glendalough Settlement and Tourism Plan which provide for new local employment within that settlement. This is surprising given that Laragh-Glendalough is a Level 7 – Large Village whereas Kilmacanogue is a Level 6 Small Town in the County Wicklow Settlement Strategy i.e. a more important and bigger settlement.

The proposed employment/enterprise area will accommodate developments which should be located within the village but not adjacent to existing residential, educational, commercial or retail uses. The location of the lands on the outskirts of the village, yet within the existing speed limit area, is ideal for these purposes. It is in an area with no specific nature conservation or amenity designations.

3.3 Employment Creation in Kilmacanogue Primary & Secondary Zones

Employment uses are only permissible in the primary and secondary zones. In the primary zone area, employment developments are only possible if they are *"small-scale light industrial and manufacturing developments that do not undermine the attractiveness of the main street are traditional town centre".*

In the secondary zone, employment creating development are possible only in the context of being able to locate, where they would not serious impact on other adjacent land uses. In other words, general industrial developments will only be acceptable, if they are on large sites with buffers between them and incompatible landuses such as residential, office, educational or tourist uses. Therefore there is a need for relatively large sites to be available

in order to facilitate new industrial type developments in the town and to create local employment.

It is therefore clear that it would be very difficult for new business or industrial undertakings to obtain planning permission within the primary or secondary zones, because of the absence of sufficiently large sites, which are sufficiently separated from existing residential and other sensitive landuses.

3.4 Sustainable Village Expansion

It is our considered opinion that the only sustainable option for the further expansion of Kilmacanogue village is to the north, in the vicinity of our client's lands, because the following.

- Kilmacanogue Marsh towards the south and the listed prospect of the Great Sugar Loaf from the N11.
- Quill Road which is unsuitable for road improvement and where development would seriously interfere with the character of the area and listed views.
- The proposed Great Sugarloaf Special Amenity Area Order which is likely to extend down to the Rocky Valley road towards the west.
- The Rocky Valley Area of Geological Interest and High Amenity Area
- The preserved views of special amenity value from the R755 Kilmacanogue to Roundwood Road.
- The expansion of Kilmacanogue village towards the east across the N11 is not sustainable because of:
    - The number of traffic and pedestrian movements generated and the length of pedestrian trips to the village centre.
    - Seriously interference with listed views of the Little Sugar Loaf from the N11.

3.5 Provision for Local Employment Generation

The Proposed Kilmacanogue Settlement Plan does not make provision for any new employment development in the town. The policies in the Proposed Kilmacanogue Settlement Plan will mean that the only local employment opportunities available in Kilmacanogue will be from existing employers. Local entrepreneurs and business people will have to invest and carry out developments in Bray instead of in their own town. The policies outlined are contrary to the various policies for employment creation in smaller settlements such as Kilmacanogue, which are in the existing Wicklow County Development Plan 2010-2016.

Our client's proposals for an employment and enterprise zoning would address some of the future employment needs in the Kilmacanogue area, reduce commuting and traffic generation and would help it to become a more self-contained settlement for its residents.

Moreover our client's proposal will allow new employment opportunities to be developed away from other sensitive land uses in the remainder of the secondary zone designated in the settlement plan. This separation, of employment land uses from other more sensitive land uses, will lead to greater protection of residential amenities within the mixed use zones proposed.

3.6 N11 Road Improvements

The Draft County Development Plan indicates that while the N11/M11 has undergone significant upgrading over the past number of years, works are still required in order to fully upgrade this national road. Wicklow County Council confirms that it will continue to promote the upgrading of the N11/M11 to ensure an adequate level of service is provided to meet the requirements of existing development and to meet the necessary population and employment growth for the County, with particular respect to capacity and accessibility to/from the N11/M11.

Wicklow County Council states that it will work closely with the various road agencies to achieve all necessary upgrading works including the *" upgrading of the N11/M11 between the County boundary and Kilmacanogue / Glen of the Downs, including road capacity and safety improvements to the main carriageway and all necessary improvements to associated junctions;"*

The Draft Kilmacanogue Settlement Plan refers to the following objective *"to carry out a feasibility study and public consultation to investigate the possibility of providing a new road to the east of Kilmacanogue which would, amongst other things, provide alternative access to properties currently directly accessed from route N11".*

Our clients will facilitate the improvement of the junction of the County road with the N11 at Jameson's corner in order to improve road safety at this junction and to further integrate this area into the heart of Kilmacanogue village.

4. CONCLUSION

We request the Council to take these matters into account when considering the Kilmacanogue Settlement Plan.

The appropriate zoning of our client's lands will facilitate local employment and enterprise developments in the village and local employment creation. It does not materially contravene any local planning policies. It would support the development of Kilmacanogue village as a self-contained settlement. It would provide local employment in the Kilmacanogue area and reduce the numbers commuting to work from Kilmacanogue.

Frank O'Gallachóir
Dip. T.C.P., M.Sc., M.I.P.I.

Map 1 Lands at Hollybrook, Kilmacanogue, County Wicklow.

C5

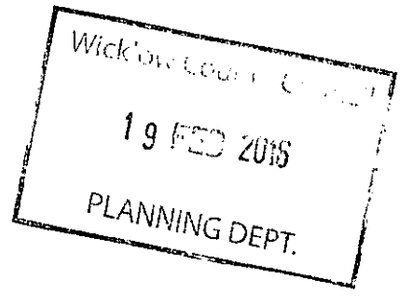
Arklow & District CHAMBER
IN BUSINESS FOR BUSINESS

Arklow Business Enterprise Centre,
Kilbride Industrial Estate,
Arklow, Co. Wicklow.

Tel: 0[illegible]

Ms Sorcha Walsh
Senior Planner
Wicklow County Council
Wicklow Town
Co Wicklow

18th February, 2016



Submission to Wicklow County Development Plan

Dear Ms Walsh

Arklow & District Chamber wish to submit the following observations for inclusion in the County Development Plan:

1. Complete the planned Lamberton over-bridge Intersection and run a link road on to the Vale Road R747 in order to provide ingress access for Arklow West and relieve traffic traversing the town unnecessarily.

2. Continue with the plan to complete an access roadway from Roadstone to the Wexford road at Meadowvale for commercial and residential traffic. This would give more direct access to the Arklow harbour area. This is an objective in the current Plan under TR39 page 173.

3. Consideration should be given to the extension of Arklow Town borders west of the M11 to meet the medium term population targets.

4. Retain the objective of a possible airport south of Arklow

5. Completion of the coastal protection work at the North Beach to include the groins which were planned but not installed when the rock armour was put in position. This would encourage the natural reinstatement of the beach and sand dunes.

These key initiatives would provide clear benefits for both the commercial and residential needs of the community in South Wicklow.

We look forward to the completion of this key strategic plan for the County.

Yours sincerely

Ann McGovern
Chamber President

Registered in Ireand No: 159953
VAT No: IE 6559953H

C6

Arklow Heritage/Nature Walks Development Company Limited

Main Objective: To Develop, with the co-operation and permission of land owners, heritage/nature walks, within the Arklow Environs and along the Arklow Valley west of Shelton Abbey for the recreation and pleasure of Arklow citizens including visitors and tourists to the town.

Charity Ref: CHY 20643

44 Fernhill,
Arklow,
Co. Wicklow.
040239849/ Mobile 0868706088

WICKLOW COUNCIL
12 FEB 2016
CORPORATE AFFAIRS

Wicklow County Council
12 FEB 2016
PLANNING DEPT.

13th February 2016

County Development Plan Review,
Planning Department,
Wicklow County Coiuncil,
Station Road,
Wicklow Town.

Subject: Wicklow Co. Co. Development Plan 2016 – 2022 Review.

A Chara,

Further to discussions with representatives at the recent public consultation day in the Arklow Municipal District Office we wish to put forward the ten items listed below for inclusion in the draft County Development Plan 2016-2022.

1. C.P.O. approximately 3 X 65 metre along by the north wall opposite the Gate lodge at the entrance Shelton Avenue Ferrybank, Arklow, in order to access the landlocked 50 acres of Marsh/Woodland, including Shelton Avenue, owned by W.C.C. and which is already in the Arklow Town plan for development with a view to opening it up for the benefit and enjoyment of the Arklow public/tourists.
2. Erect suitably designed Local Heritage Tourist Information Boards outside the entrance gates to Shelton Avenue at Ferrybank covering- a) Shelton Abbey Estate history, b) Cistercian Abbey/graveyard history, c) Ancient Railway line history, d) Marsh Wildlife Conservation Area History.
3. Provide suitably designed Viking Settlement Crannogs on the Arklow Marsh Woodland for viewing by those using our proposed nature walks on the Marsh/Woodlands.
4. Provide suitably designed Sculpured Monuments depicting our Viking Heritage at the Bridgewater Roundabout.
5. Provide footbridge access to the old Avoca/Arklow Harbour railway line bed from the proposed flood protection levee at Arklow bridge.
6. Provide a walkway (similar to the one at north beach levee) from the proposed Marsh Flood Protection Levee from the bridge to Shelton Avenue and on to the Dublin Road end of the levee.
7. Have removed or cleaned up and securely fenced off for the protection of the public the redundant pipeline along the Marsh from the closed down NET/IFI fertilizer factory.
8. Clean up the canal alongside the section of Shelton Avenue owned by W.C.C. and encourage the breeding of trout in it for the benefit of the public and tourists.
9. Provide a new access bridge from the Arklow Carpark onto the Marsh to tie in with a new Boardwalk along 400 metres of the old rail-bed proposed by us to Arklow Municipal District of W.C.C..
10. Extend Coast erosion protection Levee and walkway on top from north beach area to Porters Rocks.

Yours sincerely
For and on behalf of Arklow Heritage/Nature Walks Development Co., Ltd.

Joe Weadick Secretary.

Directors:, James Burke Chairman, Roy Dempsey Vice Chairman, Joe Weadick Company Secretary, Irene Sweeney Treasurer, Brian King PRO, Nancy Keogh, Liam Keogh, Kitty O'Shea, Pat O'Shea,.

Company Registration No. 524679. CHY 20643. Registered Office: 44 Fernhill, Arklow.

C7 [redacted]

Leonora Earls

From: Matthew Weiss [redacted]
Sent: 18 February 2016 10:50
To: Planning - Development Plan Review; Leonora Earls
Subject: Observation for the Draft County Pla n

To Wicklow County Council Planning,

This is a submission to the Draft County Plan which is submitted by a group of residents living in the area of SL03 and SL04 and have already objected to the Planning Permission 15524 for Moffash.
A- Matthew Weiss & Susan Webb, RiverRun Studio, Nun's Cross, Ashford
D- Cathal O'Gara, Ballinahinch, Ashford
E- Francis Tottenham, The Teacher's House, Nun's Cross, Ashford
F- Nicola Neumann, The Sexton's Cottage, Nun's Cross, Ashford
G- Cormac Breatnach, The Old Forge, Ballinahinch, Ashford
H- Freda Conboy-Yague & Toni Yague, Nun's Cross, Ashford
I- Brid Whyte, Cannow, Ballinahinch, Ashford
J- Andy Cusack, Holly Cottage, Ballinahinch, Ashford
K-Sharon Smith, Ballinahinch, Ashford
L- Eamon Sweeny, Forge Cottage,Killiskey Ashford
M- Ashley Harrison, Redwood Lodge, R764, Ashford
N- Barry and Christina Jenkinson, R763, Ballinahinch, Ashford
O- Kieran Dundon, Redwood Lodge, Glanmore, Ashford
P- Jenny Farrell, Ballinahinch Terrace, Ashford
Q- Peter Savage, Ballinahinch Terrace, Ashford
R- Andrew & Siobhan Trayler, "Shamwari", Nun's Cross, Ashford
S- Andy & Bronagh Banks, Ballinahinch Terrace, Ashford
T- Maureen & Dermot Soraghan, The Old Rectory, Ballinahinch, Ashford
U- Janet and Andrew Herman, Ashbrook, Ballyduff Lower, Ashford
V- Vicky O'Gara & Brian Coen, Ballinahinch Terrace, Ashford
W- Susanne and Rosalind Watson, Lindisfarne, Ballinahinch, Ashford
X- Jenny & Mick Purcell, Bramble Glade, Ashford
Y- Andy Ledwith, Nun's Cross Cottage, Ashford
Z- Brendan & Frances Rae, Bramble Glade, Ashford
AA- Desmond & Agnes Brady, Ashlawn, Ballinahinch, Ashford
AB- Tony & Helen Lenihan, Ballinahinch, Ashford
AC- Ashley Glover, Devil's Glen, Ashford

We would like to keep from details of our Objection and rather offer our observations on the principles that this development demonstrates that need resolution with the County Plan. We have met with Stephen Willoughby and understand better the concerns of the Wicklow Planners in terms of planning.

In our area the current Zoning causes Developers to apply for planning permissions according to the densities allowed within the Plan. In the case of Moffash they have used the per hectare value, not the limit of Phase1 = 90 and Phase2 = 72 with a total of 162 houses. The per hectare value of 20 per Ha would amount to 178 houses. When a development is planned with either of these values, and the green space consolidated, the resulting estate is totally out of character with the surroundings. This causes large objection as in our case, and then eventually reaching An Bord Pleanala who we will always find in favour with large community objection. This is correct as it is a perfect indicator of Out of Character, none-sustainable planning. Rather than these permissions always reaching An Bord Pleanala, it would be better to solve this at the source of the problem; The Densities specified in the Zoning document.

Background:

We have in the area several existing estates and have measured these densities
Bramble Glade - 6.1 houses per hectare - (This calculation ignores 5.15 Ha reserved as private open space).
Carrig Park - 4.2 houses per hectare
Ballinahinch Terrace - 7.2 houses per hectare (as the oldest neighbourhood it did not require mandatory open space)
Ashford Downs - 7.1 per hectare
SL04 - Zoned 8.3 houses per hectare (There is a discrepancy between what we measure as area vs. stated in the plan. (We measure 4.81 and the current plan states 4.3 Ha).

What is currently in the proposed plan is 20 per hectare for SL03 which is well above anything in the area and far above what can ever be "in character".

We propose that the density of SL03 be reduced to 7 houses per hectare which would make developers like Moffash re-evaluate what is suitable for Ashford and make more expensive, up market houses and to replace quantity with quality.

We also point out that the SL04 area is completely land locked and has no possible road access for the short or long term. We propose SL04 should be changed to "Strategic Land Reserve" as it is unrealistically zoned. Without the possibility of road access it can be left as SLR until when or if there is some change allowing for road access.

We hope that this Observation and suggestion will been seen favourably by yourselves and you will be able to support our Community in this effort. There are many more people than those listed that will appreciate your attention to this matter.

For and Behalf of the members of this Community Group,

Matthew Weiss

Contact: Matthew Weiss
Riverrun Studio
Nun's Cross
Ashford, Co. Wicklow

C8

Leonora Earls

From: Kevin [redacted]
Sent: 19 February 2016 14:03
To: Planning - Development Plan Review
Subject: FW: Review of draft development plan - Aughrim.

From: Liam OLoughlin [mailto:[redacted]
Sent: 19 February 2016 00:45
To: reviewplan@wicklowcoco.ie; P.K. MACANN CONSTRUCTION LTD. <[redacted]
Subject: Review of draft development plan - Aughrim.

I have been asked by Aughrim Community Sports and Leisure Association Ltd. to request an amendment to the draft development plan for Aughrim for 2016 - 2022.

Our group has developed a community sporting facility at Redna Road on approximately 9 acres. We have leased a further 2 acres from Wicklow Co.Council which has been developed into a small playing pitch, Alongside this land is a further 3 acres of Council owned land which is currently zoned for Employment (E)

The amendment we seek is that this parcel of land be rezoned for Active Open Space (AOS).

In the past our organisation have made enquiries about leasing this land which is in the middle of an area zoned AOS and RE (Riverfield) Our group badly needs to expand.but has little land available to us, trapped as we are by two rivers, Our need is more acute than a glance at the Aughrim map might suggest. Upwards of 40% of area zoned as AOS is not available to to the local community as it is property owned by the County GAA, This totally misrepresents the area zoned AOS for Aughrim community and has never increased during a period of rapid expansion.

Regards,

Liam O'Loughlin.

the Aughrim Community.

Leonora Earls

From: Liam OLoughlin
Sent: 19 February 2016 12:43
To: Leonora Earls
Subject: Fwd: Review of draft development plan - Aughrim.

---------- Forwarded message ----------
From: **Liam OLoughlin** <
Date: Fri, Feb 19, 2016 at 12:44 AM
Subject: Review of draft development plan - Aughrim.
To: reviewplan@wicklowcoco.ie, "P.K. MACANN CONSTRUCTION LTD."

I have been asked by Aughrim Community Sports and Leisure Association Ltd. to request an amendment to the draft development plan for Aughrim for 2016 - 2022.

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Regards,

Liam O'Loughlin.

C9

Leonora Earls

From: Tom Fortune [redacted]
Sent: 17 December 2015 22:26
To: Merrigans
Cc: Planning - Development Plan Review
Subject: Re: re;Avoca Heritage Committee submission

Evening Marie, thanks for mail, i will support your submission.

Regards
Cllr Tom Fortune

On 16 Dec 2015, at 23:05, Merrigans <andymarie@eircom.net> wrote:

Dear Secretary
Please find attached submission from
Avoca Heritage Committee re the County Development Plan 2016-2022
Yours sincerely
Marie Merrigan
Chairperson Avoca Heritage Committee
<Avoca Heritage Committee Submission to Co Dev Plan 16-22.docx>

Acknowledged
18/12/15

Leonora Earls

From: Merrigan
Sent: 16 December 2015 23:06
To: Planning - Development Plan Review
Subject: re;Avoca Heritage Committee submission
Attachments: Avoca Heritage Committee Submission to Co Dev Plan 16-22.docx

Dear Secretary
Please find attached submission from
Avoca Heritage Committee re the County Development Plan 2016-2022
Yours sincerely
Marie Merrigan
Chairperson Avoca Heritage Committee

Avoca Heritage Committee
c/oMarie Merrigan Chairperson
Ballymoneen
Avoca
Co Wicklow
16/12/15

County Development Plan Review,
Planning Department,
Wicklow County Council,
Station Road,
Wicklow Town.

RE; Submission to County Development Plan 2016 – 2022. from the Minister for Communications, Energy and Natural Resources the land owner, on behalf of the State, on the former mines at Avoca (pages 89, 90, 91 of the submissions by elected representatives and prescribed bodies)

Dear Secretary

Our committee are concerned by the application from The Minister for Communications, Energy and Natural Resources regarding the Avoca former mines site. He has applied to repeal the protected status of the large sections of the Avoca minesite as a heritage area in the County Development Plan 2016 – 2022.

THE MINISTER FOR COMMUNICATIONS, ENERGY AND NATURAL RESOURCES give the following reasons for wishing to rescind this status.

1. *They state "The spoils at Avoca Mines are contaminated with heavy metals and arsenic that pose a risk to human health.*

The contaminants within the Tigroney Spoil are considered to be in environmentally significant concentrations that supports the capping of the Tigroney Spoil Area to prevent exposure to humans, plants and animals "

The contaminated hazards in the spoil for humans are misinterpreted because;

In summer 2013 Vikings filmed at the Avoca Minesite & recently ---Oct 2015 Penny Dreadful filmed at the Avoca Minesite. The personnel in both these productions were not only walking in the spoil area but actually rolling around in the spoil in some instances. They also carried out local excavations. Therefore If the spoil was a human hazard then the actors' health and safety would have been knowingly compromised by THE MINISTER FOR COMMUNICATIONS, ENERGY AND NATURAL RESOURCES.

2. *"and to prevent contaminated surface runoff and infiltration into the groundwater, that both ultimately discharge to the Avoca River. "*

The geology of the entire Avoca area is made up of minerals and metals. Rainwater falls both on the immediate mine site area and the surrounding area regardless. When rain falls it soaks into the ground which consists primarily of metals and minerals The water then drains into underground water courses through the minesite and subsequently into the Avoca river bringing with it the metal /mineral contamination which is the natural composition of the Avoca geology.

Disturbing the spoil heaps will create much more contamination as this ground is now settled.
The volume of water that is coming out of the adits is coming from an underground area far in excess of the mine site area. Yet all this water is contaminated

THE MINISTER FOR COMMUNICATIONS, ENERGY AND NATURAL RESOURCES comments on the unstable cliff face of the open pits. This is an important feature of opencast mining and it should be protected . Leave it as it is. It is a heritage area which should be fenced and so it can be viewed by all

3. *"The continuing designation of these spoil heaps (mine waste) as protected structures,delays and limits their essential remediation, and will result in the continuation of a negative environmental impact on the environment"*

The film crew recently had a teleporter working on top of the spoil heap named Mt Platt
Therefore the spoilheaps are not unstable

Once again we see a mis -interpretation of their own reports in the THE MINISTER FOR COMMUNICATIONS, ENERGY AND NATURAL RESOURCES submission to WCC
Therefore EMD DCENR want the protected structure status revoked to undertake works which are unnecessary

In Oct 2014 works were undertaken at Whitebridge No planning permission was sought for these works. WCC issued an enforcement order and now THE MINISTER FOR COMMUNICATIONS, ENERGY AND NATURAL RESOURCES has applied for retention of planning. This area is listed in the WCC register of protected structures it is a heritage area. The dept of energy did not engage an archaeologist to record the heritage during these works. When /if heritage has to be destroyed then it must be first recorded by a suitable qualified professional in this case an archaeologist specialising in mining archaeology and any artifacts that can be saved must be saved. This ensures that this part of the Avoca story is preserved for all time. At Whitebridge metal and timber artifacts were exposed and then destroyed by the excavators in full public view. At West Avoca recently the THE MINISTER FOR COMMUNICATIONS, ENERGY AND NATURAL RESOURCES capped two shafts with out planning permission and once again they did not record the heritage they destroyed. part of planning conditions archaeologist on site

We understand from the above outlined actions that heritage protection is not within the remit of the THE MINISTER FOR COMMUNICATIONS, ENERGY AND NATURAL RESOURCES.The Avoca Mine Heritage Site is a heritage site in its own right and if the heritage is preserved it has the potential to be developed as an economically viable tourism product. To this end the minesite, its buildings and associated disturbed ground must be protected. Adequate protection for the Avoca Mine site can only be achieved if it is listed in the county development plan as THE MINISTER FOR COMMUNICATIONS, ENERGY AND NATURAL RESOURCES have shown that they will not protect the heritage of the minesite.

Section 9 of the County Development plan refers to heritage tourism. but THE MINISTER FOR COMMUNICATIONS, ENERGY AND NATURAL RESOURCES seems to be ignoring the primary characteristic of Heritage Tourism; authenticity is the essence of Heritage Tourism. The natural environment for mining features architectural ect is the minespoil landscape as is evident in mine heritage tourism projects on a world wide basis

The mine-landscape is as important a mining heritage feature as the architectural features on the site. Different types of spoil tell different stories from different eras of Avocas mining history. The site has never had an archaeological assessment.

The unique mine landscape cannot be destroyed as this would ruin not only the visual impact of the landscape but also the heritage on which this project is to be based.

Authenticity creates the" WOW" factor in Heritage Tourism which is about the genuine heritage of the area and not about sanitised or fabricated heritage. Turning an industrial heritage site into a " fake sanitised site would be a tacky product, lacking the authenticity and the charisma to attract the tourists it is intended to entertain. The dept of energy are seeking to revoke the protection from and subsequently destroy some of the very features that showcase the Avoca Mine Heritage .

To date Wicklow County Council have been the only authority to realise and to protect Avoca's unique industrial heritage. We beseech Wicklow County Council to continue to protect Avoca's mine heritage by listing the entire minesite as a protected structure in the Count Deelopment Plan 2016-2022.

Yours sincerely

Marie Merrigan

Avoca Heritage Committee

Myles Smith
Received by hand at
Arklow Public meeting
C10

DRAFT WICKLOW COUNTY DEVELOPMENT PLAN 2016-2022

Avoca Settlement Plan Submission from Avoca Tidy Towns & IT Centre Committee

Page 144

1. Avoca Settlement Plan

   Settlement Profile

   Paragraph 2 refers to the town providing a betting office which has been closed for a number of years but makes no reference to the pharmacy, hairdressing salon and beauticians that are currently in business.

   Paragraph 3 refers to the charm of the town being diminished somewhat by traffic congestion. Recently WCC have added footpaths, double yellow lines and parking spaces along the main street which have dealt with traffic congestion. The only current problem contributing to traffic congestion is the insistence of tour bus operators parking in the parking spaces on the main street even though they are marked as 20 min parking only. More signs displaying this 20 min directive and directing traffic to the Church car park might help.

   Key Infrastructure

   Water Supply:

   There has been extensive work done on the water supply to Avoca. What is its current status?

   Wastewater:

   What is the current status?

   Avoca Specific Development Objectives

2. (ii) Development of the Red Kite Walk is complete. Avoca Tidy Towns hope to develop further longer walks.

3. In the Primary Zone

   (b) (i) improving the safety of turning movements between the bridge and the main street,
   New footpaths, a crossing and new junction layout have all been completed here.

(b) (ii) improving pedestrian safety,
A new crossing and stop sings have been put in place.

(b) (iii) reducing traffic congestion on the main street
Footpaths and double yellow lines along both sides of the main street are now in place which have considerably reduced reduced traffic congestion.

(b) (iv) improving the provision of footpaths.
Avoca has footpaths along both sides of the main street, a footpath from the church car park to the Avoca Handweavers, a footpath from the main street to Avoca Wood, a footpath from the main street to the Meetings and a footpath from the main street to Woodenbridge.

(b) (vi) provision of pedestrian link between Avoca Handweavers and the town centre.
WCC have already provided a footpath from Avoca Handweavers to the town centre.

(c) To encourage and facilitate the extension or redevelopment of the Old School Community Centre for community uses.
Avoca Community Hall Ltd. Committee have completed extensive renovation on the community hall and it is currently running at full capacity.

(d) Delaney's property
The property referred to here hasn't been owned by Delaney's for a number of years and is currently in receivership.
Continue needs protection + assistance.

Possible addition of
(h) To allow for development of an equipped play space at a suitable location.

a1

Leonora Earls

From: Dave Ballesty [
Sent: 17 February 2016 15:43
To: Planning - Development Plan Review
Subject: Wicklow County Draft Development Plan

I would like to make the following comments in relation to the draft development plan 2016 - 2022.

Wicklow Harbour

I welcome the recognition of the commercial benefit, and potential, of the harbour, and the desire to develop of the harbour economic activity. I also welcome the recognition of the amenity value of the harbour "there is potential to expand the range of recreational and tourist facilities associated with its coastal location". The creation of the Wicklow Harbour Users Amenity Group should facilitate consultation on development plans.

I welcome the aspiration to develop an outer break water to protect Wicklow harbour form north easterly winds, thus enhancing the economic and social potential of the harbour both local and those visiting the harbour. But development of the potential should not be held up awaiting the breakwater development.

There is massive scope for the management of all the boats up river. Pontoons and mooring management, behind Wire Ropes and the warehouse with the new art work, could provide significant space savings and management of the local open boats. This would in turn allow space for sailing boats, both visiting and local to birth alongside the quay, while tour boats and fishing boats continue to birth on the town side quay wall, to facilitate their loading and unloading.

In relation to the draft plan, we welcome the objective to support and facilitate existing and future commercial port activities within the County and to resist developments that would undermine the commercial potential of these areas. A mix of restaurants and shops, similar to the development around the Fish Shop, and the Bridge, on the town side of the south quay, could provide a destination for locals and tourists alike, while the harbour activity will provide a "working port" environment, similar to many towns in Brittany.

Maritime

I would welcome an objective to develop the marine infrastructure in the county that would facilitate development of a "Blue Way". This is similar to a Green Way, but is water based. A south east coast corridor linking Bray, Greystones, Wicklow, Arklow and ports in Wexford could create opportunities for more boats to visit and overnight in the ports, with the accompanying revenue for the town. There are two markets here, the Dubin overnight market, and the touring boats. The creation of the major marina facility in Greystones has shown the potential for the Dublin boats to be tempted out of their bay, with the right regatta, or overnight facilities (pontoons, moorings, electricity, water and waste facilities. (See Greystones regatta participation numbers). Touring boats, tempted to the Wild Atlantic Way need a route home, and the east coast is the obvious choice, so there is a market their to be developed.ir boats to these facilities.

There are water cleaning developments available that seek to take litter out of the water, e.g. "seabins". An objective seeking to place a water based litter gathering system in all the ports would be welcome.

At present Wicklow harbours host a number of regattas hosting visitors from all over Ireland and abroad. We have no easy means of recording the economic value of these visitors to the town. An objective to develop an app that would allow visitors record the reason for their visit, and their expenditure, on accommodation and food, would provide data that could feed into investment decisions. (The local authority in Ards North Down have a form that goes to all visitors to sailing events).

Wicklow County Council support clubs in a major way, and we are thankful for this, I would welcome a commitment to continuing the local sports partnership funding and consideration for funding for sports officers, similar to Dublin City.

Light Pollution

I would welcome an objective to seek to maintain "dark Skyes" in the area of Wicklow Mountains National Park, and adjacent lands. This however would need to have the support of a light policy of downward lighting only in urban areas, and along transport routes. The light pollution looking north from Wicklow is a shame, particularly the N11 - Greystones road. While safety on the walking and cycling tracks adjacent

to this road is required, there are better lighting systems that would reduce the glare, and focus the light onto areas that need it.

Coastal Erosion
A decision needs to be taken about the long term protection of the current coast line, which it seems is only protected by the rail line north of Wicklow. If it is decided that it is economically unviable to maintain this coast line, then plans should be put in place that develop a twin rail track north to an intersection with the DART in Bray. Bray should be a hub, from which commuters transfer off an outer rail system onto DARTs, and the Luas if the Greater Dublin Transport plan gets the go ahead.

Amenity Parking.
While there is a need for revenue, the ecumenic value of attracting visitors and locals to our tourist attractions needs to be recognised. The health benefits, and reduction in expense the the state, of walking, for example Brittas Bay, or the Wicklow Hills, should be a reason not to charge into parking in these areas in off season. (This may be mid week outside of summer months for parking adjacent to hills, or non summer months for parking adjacent to coasts.)

Health related development.
Any new school development should have parking within 1K severely restricted. If a child has to walk to school, or part of the way to school, then they arrive dressed for outside activity, and can participate in external class activity. Proper pathways should be a requirement for these developments.
The lack of path space in Wicklow Housing developments, due to cars parking on the paths, indicates that there is a need to review the requirement for parking spaces in urban developments. The provision of the parking spaces do not have to be outside the accommodation, they can be in a collective area, which can have dual use, playing surface, when the population is at work. Having his space overlooked by residents, in rooms that are occupied day time and evening will provide a security. This would mean that there is a requirement for some kitchens to face the parking space and some sitting rooms to face the parking.
The current requirement for quality cycle routes adjacent to new roads should continue.

Transport
According to the Greater Dublin Transport plan, traffic on the M11/N11/M50 corridor is at capacity, during peak time. They envisage the need for quality bus corridors along this route, serving Dublin City Centre.
As increasingly work is spreading around the M50, WCC should argue for a QBC around the M50.
In line with the QBC development, pac and ride sites need to be planned for. These could be served by local bus companies with smaller busses serving both towns and villages along the route.

Thank you for your time in considering these ideas.

Regards

Dave Ballesty
154 Rose Hill
Wicklow Town

C12

Leonora Earls

From: green meadow Farm [c
Sent: 20 February 2016 07:29
To: Planning - Development Plan Review
Subject: Barniskey Church , Redcross

Hello

my name is Bernard Brennan,I am a member of Barniskey church committee, I was speaking to Deirdre Burns the other day about Barniskey church and getting it possibly added to the protected structures list , I know I am a few hours late for the submission but I would be really greatly appreciative if you could consider adding this fine building to the list as we as a committee are really interested in preserving Barniskey church going into the future.
The Building dates back to 1803 and is in reasonable condition as we keep it well.

Hope to hear from you soon and you can contact me any time

Kind regards

d Brennan

C13

Craigie Cottage,

Monastery,

Enniskerry,

Co. Wicklow.

12th. February 2016.

Wicklow County Council

16 FEB 2016

PLANNING DEPT.

County Development Plan Review,

Planning Department,

Wicklow County Council,

Station Road,

Wicklow Town.

A Chara,

My name is Noel Barry. I live in Craigie Cottage in the townland of Monastery, Enniskerry. I wish to make a submission with regard to the Draft Development Plan for County Wicklow which has been published by Wicklow County Council.

I originally made a submission when the Plan was being prepared. I called by arrangement to the Planning Office some weeks ago and met with a Planning Official there to discuss the newly published Draft Plan and what impacts it may have on the local area of Monastery/County Brook. I was advised to make a further submission in writing with regard to the newly published Draft Plan. I was unable to attend the recent consultation process in Enniskerry, as I was not aware it was taking place.

The following is my submission;

HAVING REGARD TO THE LARGE HOUSING DEVELOPMENTS THAT ARE BEING PLANNED FOR THE MONASTERY AND COUNTY BROOK LOCATIONS IN THE DRAFT DEVELOPMENT PLAN FOR THE ENNISKERRY AREA, THAT THE NORTHERN DEVELOPMENT BOUNDARY FOR ENNISKERRY SHALL BE SET AT THE BALLYMAN ROAD, ITS NATURAL BOUNDARY, AS SHOWN IN THE PLAN,AND THAT THE PROTECTED VIEW OF THE SCALP AND THE SCALP VALLEY FROM THE

BALLYMAN ROAD BE RETAINED IN THE NEW PLAN. THE LOCATION FOR THE VIEW AS SHOWN ON THE DEVELOPMENT PLAN MAP IS THE INCORRECT LOCATION. THE SCALP CANNOT BE SEEN AT ALL FROM THAT POINT. THE LOCATION SHOWN IS IN FACT THE LOWEST POINT IN THE TOWNLAND OF MONASTERY AND IS SURROUNDED BY HOUSING.

I enclose some documentation with my submission as advised by the official in the Planning Department.

(1) This is titled,The Geological Heritage of Wicklow. An Audit of County Geological sites in Wicklow, published by the Heritage Council and supported by the Geological Survey of Ireland. The report is an action of the County Wicklow Heritage Plan 2009-2014. I enclose an extract from it. The road referred to, the Old Connaught to Enniskerry road is in fact the Ballyman Road. The view referred to, from the south, is the view from the Ballyman Road, the protected view.

(2) I also enclose a copy of a letter which I obtained in 1999, from Dr. John Feehan of the Department of Environmental Resourse Management in U.C.D. There was a proposal at that time to extend the Northern Development boundary on past the Ballyman Road and up through the valley towards the Scalp. I had watched the excellent R.T.E. series, " Exploring the Landscape" which was made by Dr. Feehan, and which featured The Scalp in one of the programmes, so I approached him to ask his opinion on the subject.

(3) Copy of Enniskerry Town Plan obtained during my visit to Planning Office. I am using this map to highlight the incorrect location of protected view of the Scalp and Scalp Valley and also to highlight the previous and correct location. This shows the exact location of this outstanding vista.

Yours sincerely,

Noel Barry

Noel Barry

WICKLOW – COUNTY GEOLOGICAL SITE REPORT

NAME OF SITE	**The Scalp**
Other names used for site	*An Scailp*, which means 'the chasm' or 'the cleft'
IGH THEME	**IGH7 Quaternary**
TOWNLAND(S)	**Barnaslingan (Dun Laoghaire-Rathdown)** **Killegar (Wicklow)**
NEAREST TOWN/VILLAGE	**Kiltiernan (Dun Laoghaire-Rathdown)** **Enniskerry (Wicklow)**
SIX INCH MAP NUMBER	**3**
ITM CO-ORDINATES	**712552E 720214N (centre of channel)**
1:50,000 O.S. SHEET NUMBER	**50, 56 GSI BEDROCK 1:100,000 SHEET NO. 16**

Outline Site Description
The Scalp comprises a deep channel that was formed by meltwater erosion on the northeastern flank of the Wicklow Mountains. The channel is oriented generally north–south, and extends for a distance of approx. 700m.

Geological System/Age and Primary Rock Type,
The feature is formed in an area of bedrock outcrop and subcrop, and bedrock crops out along the majority of the channel sides, giving the feature its 'scalped' or 'carved out' appearance. The feature was etched out by meltwater during deglaciation at the end of the last Ice Age, about 12,000 years ago.

The bedrock in the locality is dominated by granite, but the southernmost portion of the channel is etched into mica-schist.

Main Geological or Geomorphological Interest
The Scalp channel is up to 70m deep and has a U-shaped profile, typical of meltwater channels. The base of the channel is dry, although a drainage ditch has been dug along most of its length to channel excess surface water during heavy rainfall.

The Scalp is considered to have formed completely in the late-glacial Period. Initially the Scalp was a subglacial channel, formed under the ice, but later carried surface glacial outwash into Glacial Lake Enniskerry from an ice margin just to the north. The channel carried huge amounts of subglacial meltwater draining the ice sheet which covered the Irish Midlands close to its zone of convergence with Irish Sea Basin ice. This very high energy meltwater flow resulted in the Scalp's unusual depth and size.

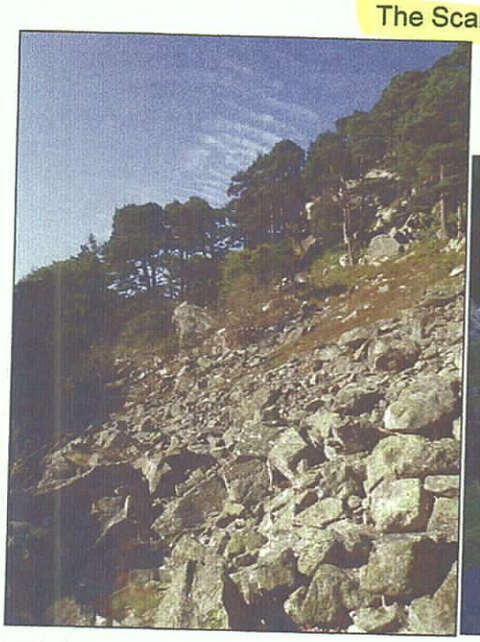
Much of the sides of the channels are very steep, and littered with (often huge) boulders, some in quite precarious positions above the R117 road, which passes through the feature. This makes the site a popular rock climbing destination. This also means many of the huge boulders have interesting names, such as 'Quartz Crag', 'Eugene's Pinnacle' and 'Rothery's Rocks'.

Site Importance – County Geological Site; may be recommended for Geological NHA
This is a site with good teaching potential on glacial meltwater erosion, as the feature is accessible, quite spectacular, and easily viewed from roads.

Management/promotion issues
The roadside location of the channel means it is easily accessible, although the flanks are located presumably in private ownership or in commonage. However, there is no parking nearby and it is difficult to stop safely on the road. A good impression of the feature can be had by driving through it on the R117 road, but the view from the Old Connaught to Enniskerry road, to the south, is better.



The Scalp, viewed from the south.





Left: Large boulders along the eastern flank of the Scalp. Right: One of the huge boulders along the R117 road.



The Scalp, viewed from the north.

Department of Environmental Resource Management, Faculty of Agriculture
Belfield, Dublin 4, Ireland

Tel: +353 1 706 7737/7726 Fax: +353 1 706 1102



University College Dublin
Department of Environmental Resource Management

COPY

e-mail: **jfeehan@macollamh.ucd.ie**

22 February 1999

Mr Bryan Doyle
County Secretary
Wicklow County Council
County Hall
Wicklow

***Re.* County Wicklow Draft Development Plan: rezoning of land near the Scalp**

Dear Sir

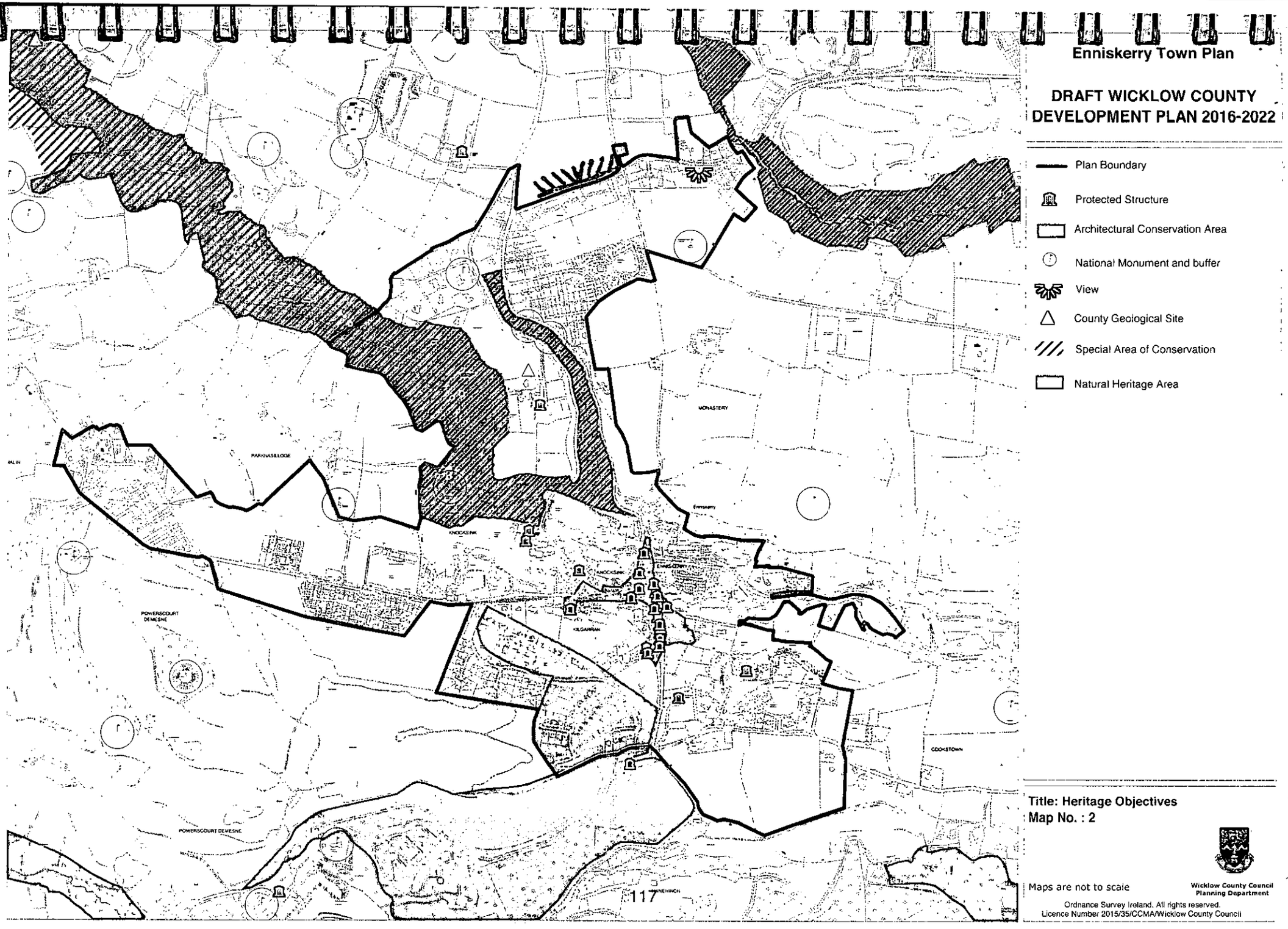
I note with some considerable disappointment and concern the proposal to rezone a small area of land at Countybrook contained in the County Wicklow Draft Development Plan. This is precisely the spot selected by our film team some years ago when we were seeking the best point from which to view the Scalp for one of the programmes in the RTE television series *Exploring the Landscape*. The Scalp is not merely a scenic feature: it is one of the most outstanding examples of a glacial overflow canyon anywhere in the country, and one of the most visually dramatic features that tell of the fascinating early postglacial history of the county. It would be a great pity indeed if the view of the Scalp from this point were to be obscured in the way the proposed development would make inevitable. A further reason for concern is that the rezoning of this site sets a precedent for interference with lesser scenic views. If it can be done with one as unique as this, it will be done with any scenic view.

I note that in Schedule 3 of the plan the view of the Scalp from the Ballyman Road is included as a View of Special Amenity Value or Special Interest. Surely this precludes the rezoning of the land in Countybrook?

Yours sincerely

Dr John Feehan

National University of Ireland, Dublin
Professor J.P. Curry, B.Agr.Sc., Ph.D., D.Sc., Head of Department


Enniskerry Town Plan
DRAFT WICKLOW COUNTY DEVELOPMENT PLAN 2016-2022
Plan Boundary
Protected Structure
Architectural Conservation Area
National Monument and buffer
View
County Geological Site
Special Area of Conservation
Natural Heritage Area
MONASTERY
PARKNASELOGE
KNOCKSINK
KILGARRAN
POWERSCOURT DEMESNE
COOKSTOWN
Title: Heritage Objectives
Map No. : 2
Maps are not to scale
Wicklow County Council
Planning Department
Ordnance Survey Ireland. All rights reserved.
Licence Number 2015/35/CCMA/Wicklow County Council

16th February 2016

In addition to submission made by me with regard to Draft Development Plan, I wish to make the following observations, and I refer to one of the route options for the proposed Northern access routes, which is shown on the Enniskerry Town Plan.

This proposed road is shown as taking a route from the proposed Tassaroe development in a north westerly direction to the Ballyman road. Both options indicate that the proposed road will cut through lush countryside and pass very close to Rannock House, a working farm. The more westerly option then appears to enter an old private laneway which leads to Rannock House. This is a very narrow laneway and several gardens (including my own) back on to it. It is only a matter of feet from my home.

I have lived in this house for just shot of seventy years and at one time there were five locked gates on the laneway, although stiles were provided for pedestrians. During the last few years four of the gates have been removed leaving just one unlocked gate. Traffic has now started to use the narrow lane and it has become unsafe to walk or cycle along it.

It is being used at all times by traffic as an access route to the Enniskerry soccer club facility in old Tassaroe, although access to that facility should be from the N11. (See Wicklow County Council Planning Report by Aisling McNamara, Site visit 2.11.09, from Planning File 07/2236)

The result of all this traffic is that cracks have begun to appear in my cottage which was constructed circa 1900 and which has no concrete foundations. I would welcome an inspection at any time.

Local opinion in Enniskerry questions the need for this proposed road, as Enniskerry village is only one and a half miles from the M50/N11 road and the proposed Tassaroe development practically beside the M50 at the Tassaroe interchange. There is also a plan to build a bridge over the Ballyman Glen in a North-South direction as part of the overall Tassaroe development

Niall Barry

C14

bba architecture

Ref:CO94CDP16/bba3

Wicklow County Council,
Planning Department,
County Buildings,
Wicklow Town,
Co. Wicklow.

19th February 2016

RE: WICKLOW COUNTY DEVELOPMENT PLAN – KILQUADE VILLAGE

Dear Sir/Madam,

We write to suggest that Kilquade be given a status/settlement boundary as a village in the draft County Development Plan.

There are 60 dwellings in this settlement, a church and a large garden centre. Please see attached map.

We suggest the proposed is in keeping with the proper planning and sustainable development of the area.

Yours sincerely,

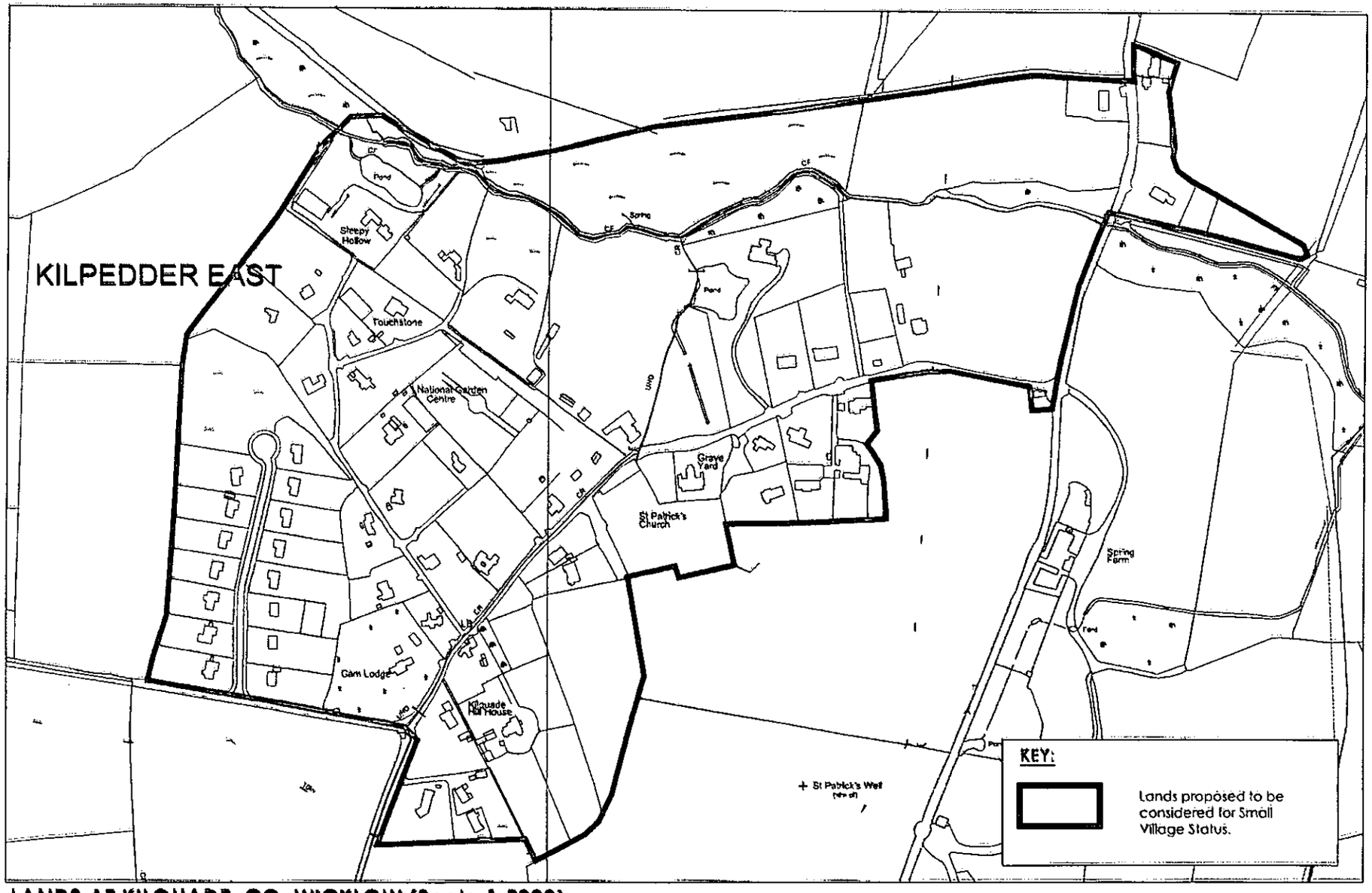
Michael Browne
For bba architecture

Suite 3, The Eden Gate Centre, Delgany, Co. Wicklow.
Telephone: + 353 (1) 287 6949 Facsmile: + 353 (1) 287 3521 email: info@bba.ie

Contact

Michael Browne	Chartered Engineer, M.I.E.I.M.I. Struct E. Dip. Const. Law, Dip. BA Mgmt.
Luis Reis	B.Arch. MRIAI
John Healy	Dip Arch. Tech.
Stuart Bell	MSc. Arch. Project Mgmt. RIAI Arch Tech

bba architecture VAT REG No. I.E. 3491561IM



LANDS AT KILQUADE, CO. WICKLOW (Scale 1:5000)

NOTE:
Map produced for diagrammatic purposes only. Do not scale off.

bba architecture
SUITE 3, EDEN GATE CENTRE, DELGANY, Co. WICKLOW
TEL: 2874949 / 2874950. FAX: 2873551
E-MAIL: bba.ie

C15

bba architecture

Ref:CO94CDP16/bba4

Wicklow County Council,
Planning Department,
County Buildings,
Wicklow Town,
Co. Wicklow.

19th February 2016

RE: WICKLOW COUNTY DEVELOPMENT PLAN – KILQUADE HILL

Dear Sir/Madam,

We write to suggest that Kilquade Hill be given a status/settlement boundary as a village in the draft County Development Plan.

There are close to 50 dwellings in this settlement. Please refer to the attached map.

We suggest the proposed is in keeping with the proper planning and sustainable development of the area.

Yours sincerely,

Michael Browne
For bba architecture

Suite 3, The Eden Gate Centre, Delgany, Co. Wicklow.
Telephone: + 353 (1) 287 6949 Facsmile: + 353 (1) 287 3521 email: info@bba.ie

Contact

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John Healy	Dip Arch. Tech.
Stuart Bell	MSc Arch. Project Mgmt. IRIAI Arch Tech

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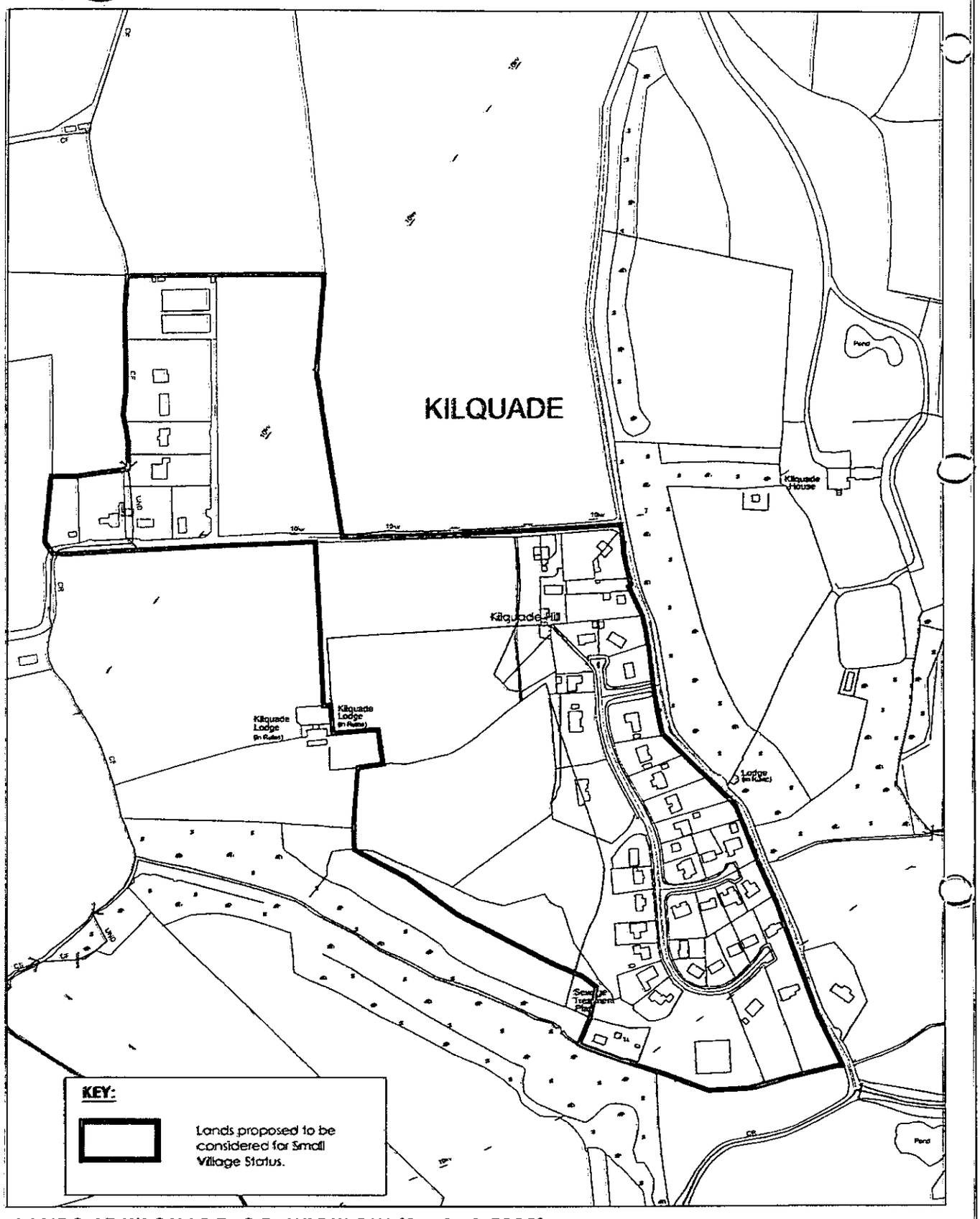
213



LANDS AT KILQUADE, CO. WICKLOW (Scale 1:5000)

bba architecture
SUITE 3 ESSEX GATE CENTRE, DELGANY, Co. WICKLOW
TEL: 2876949 / 2876990 FAX: 2873521 E-MAIL: info@bba.ie

NOTE:
Map produced for diagrammatic purposes only. Do not scale off.

C16

bba architecture

Ref:CO94CDP16/bba

Wicklow County Council,
Planning Department,
County Buildings,
Wicklow Town,
Co. Wicklow.

19th February 2016

RE: WICKLOW COUNTY DEVELOPMENT PLAN/KILPEDDER/WILLOWGROVE

Dear Sir/Madam,

We suggest that the boundaries of Kilpedder be extended northwards as shown on the attached.

The residents in this area are part of the local Community in Kilpedder and would correctly be included in the village boundary.

We suggest this would be in the proper planning and sustainable development of the area.

Yours sincerely,

Michael Browne

Michael Browne
For bba architecture

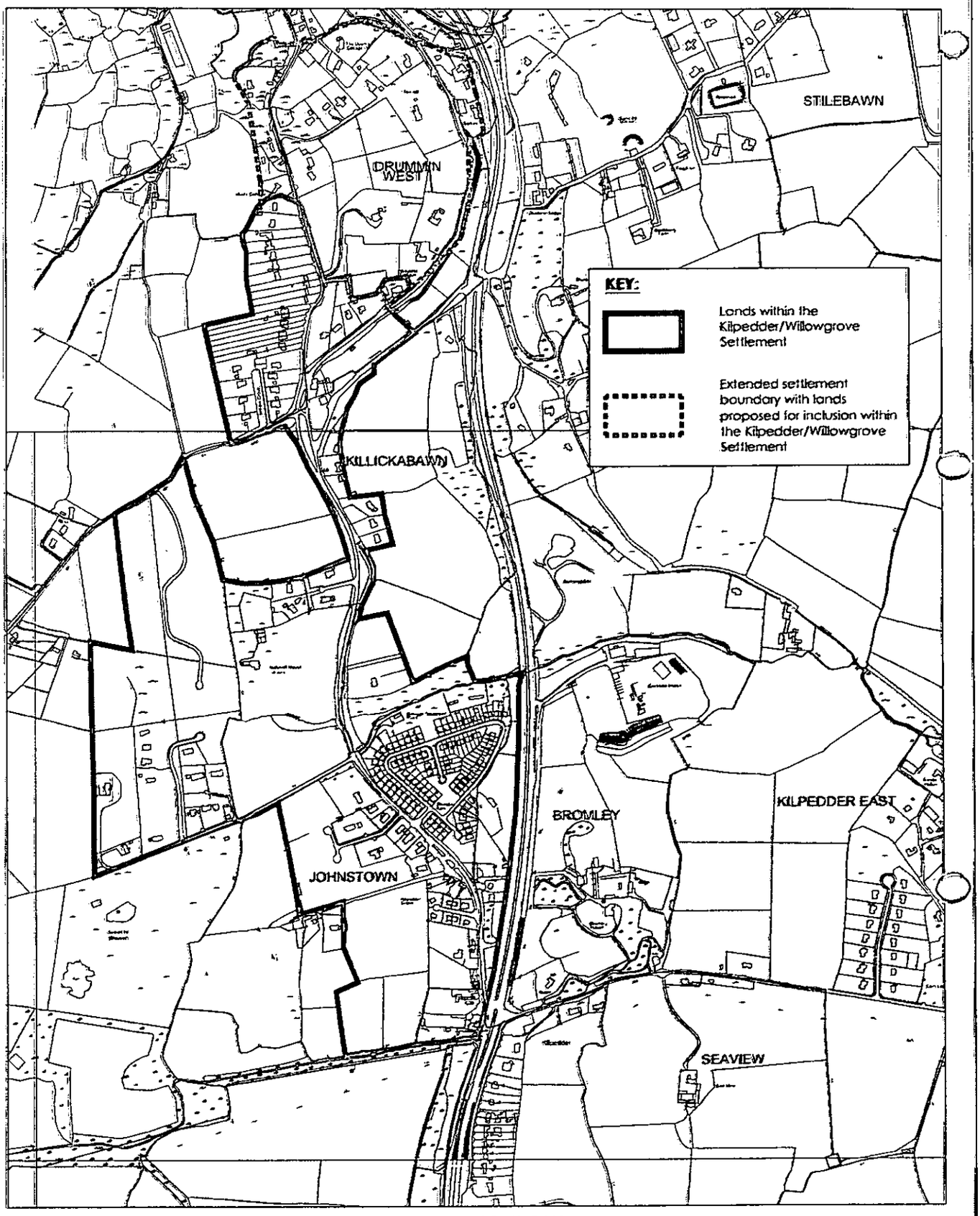
Suite 3, The Eden Gate Centre, Delgany, Co. Wicklow.
Telephone: + 353 (1) 287 6949 Facsmile: + 353 (1) 287 3521 email: info@bba.ie

Contact

Michael Browne	Chartered Engineer, M.I.E.I. M.I. Struct E. Dip. Const. Law. Dip. EIA Mgmt.
Luis Reis	B Arch. MRIAI
John Healy	Dip Arch. Tech.
Stuart Bell	MSc Arch. Project Mgmt., RIAI Arch Tech

bba architecture VAT REG No. I.E. 3491561M

813



LANDS AT KILPEDDER/WILLOWGROVE, CO. WICKLOW
(Scale 1:10,000)

bba architecture

NOTE
Map produced for diagrammatic purposes only. Do not scale off.

C17

Leonora Earls

From: Michael Browne
Sent: 19 February 2016 16:28
To: Planning - Development Plan Review
Subject: County plan submission
Attachments: 4256_001.pdf

Kind Regards,
Michael Browne

bba architecture
Suite 3 Eden Gate Centre, Delgany, Co. Wicklow.
Tel: +353(1) 2876949 **Fax:** +353(1)2873521
Email: michael.browne@bba.ie

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bba architecture

Ref:CO94CDP16

Wicklow County Council,
Planning Department,
County Buildings,
Wicklow Town,
Co. Wicklow

19th February 2016

RE: WICKLOW COUNTY DEVELOPMENT PLAN – LANDS TINAHELY, CO.WICKLOW

Dear Sir/Madam,

We write to propose that the lands shown on the attached plan be zoned residential.

We suggest that this will consolidate existing residential zoning in this location in Tinahely.

Trusting that the above and attached is in order, and in accordance with the sustainable development of the area.

Yours sincerely,

Michael Browne
For bba architecture

Encl.

Suite 3, The Eden Gate Centre, Delgany, Co. Wicklow.
Telephone: + 353 (1) 287 6949 Facsmile: + 353 (1) 287 3521 email: info@bba.ie

Contact

Michael Browne	Chartered Engineer, M.I.E.I. M.I. Struct E. Dip. Const. Law. Dip. EIA Mgmt.
Luis Reis	B Arch. MRIAI
John Healy	Dip.Arch. Tech.
Stuart Bell	MSc.Arch. Project Mgmt. RIAI Arch Tech

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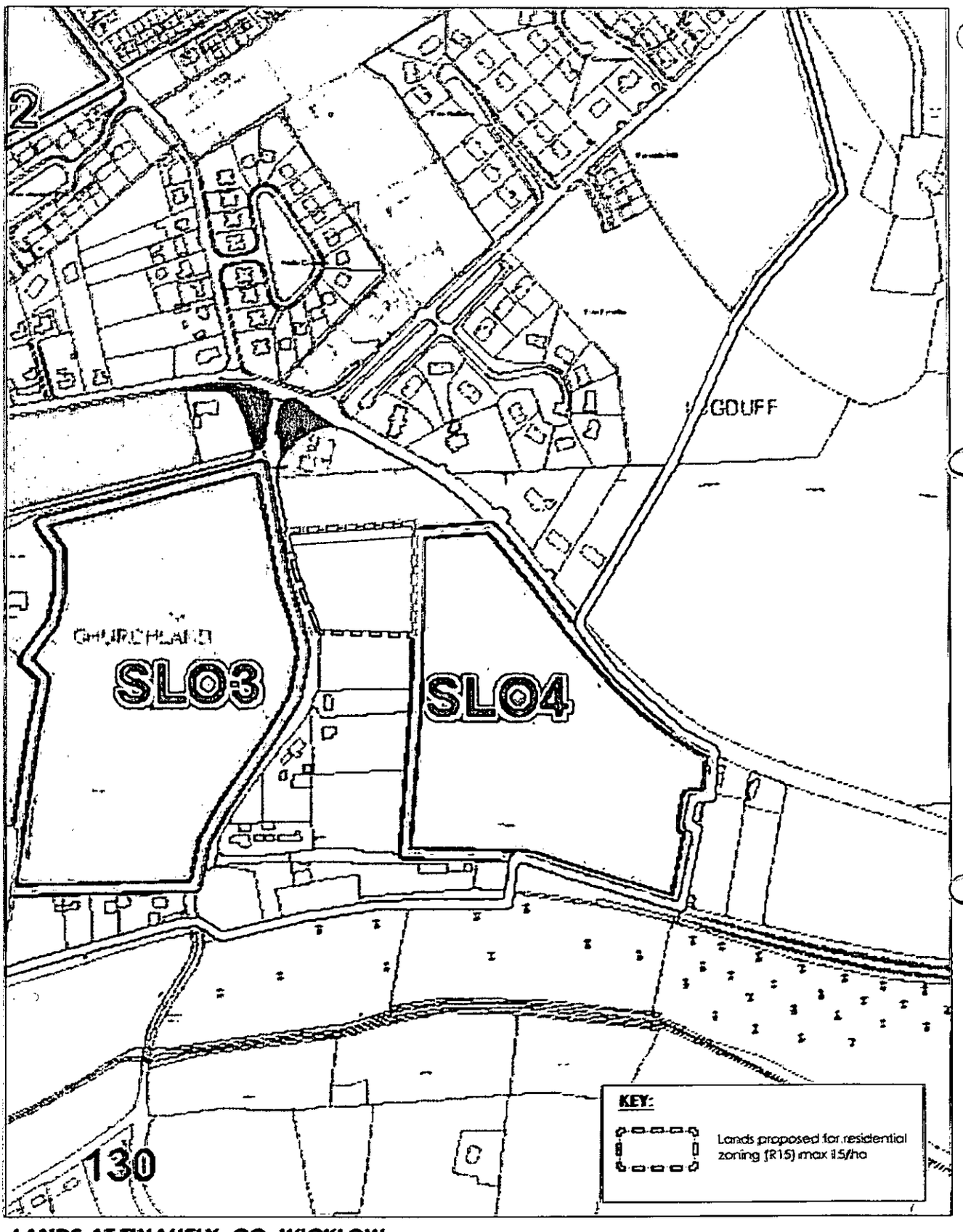

LANDS AT TINAHELY, CO. WICKLOW

bba architecture

NOTE:
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C18

bba architecture

Ref:CO94CDP16/bba2

Wicklow County Council,
Planning Department,
County Buildings,
Wicklow Town,
Co. Wicklow.

19th February 2016

RE: WICKLOW COUNTY DEVELOPMENT PLAN – DEVELOPMENT STANDARDS

Dear Sir/Madam,

We write to suggest that the requirement for duplex apartments to be provided with private open space similar to housing is unworkable and impractical and suggest that this requirement be omitted under Open Space Dwellings ~~(including own door duplexes)~~ Page 11 Section 1 standards of the draft county plan and in other areas in the plan with similar requirements.

We suggest that this will encourage building duplexes and be in accordance with the proper planning and development of the area.

Yours sincerely,

Michael Browne.

Michael Browne
For bba architecture

Suite 3, The Eden Gate Centre, Delgany, Co. Wicklow.
Telephone: + 353 (1) 287 6949 Facsmile: + 353 (1) 287 3521 email: info@bba.ie

Contact

Michael Browne	Chartered Engineer, M.I.E.I. M.I. Struct E. Dip. Const. Law., Dip. EIA Mgmt.
Luis Reis	B Arch. MRIAI
John Healy	Dip Arch. Tech.
Stuart Bell	MSc Arch., Project Mgmt., RIAI Arch Tech

bba architecture VAT REG No. I.E. 3491561M

C19

18th February 2016

Wicklow County Council
18 FEB 2016
PLANNING DEPT.

Wicklow County Council,
Ms. Sorcha Walsh,
Senior Planner,
County Buildings,
Wicklow Town,
Co. Wicklow.

45 Main Street,
Arklow,
Co. Wicklow.

Re: Submission on Draft Wicklow County Development Plan 2016 -2022
Lands in Aughrim

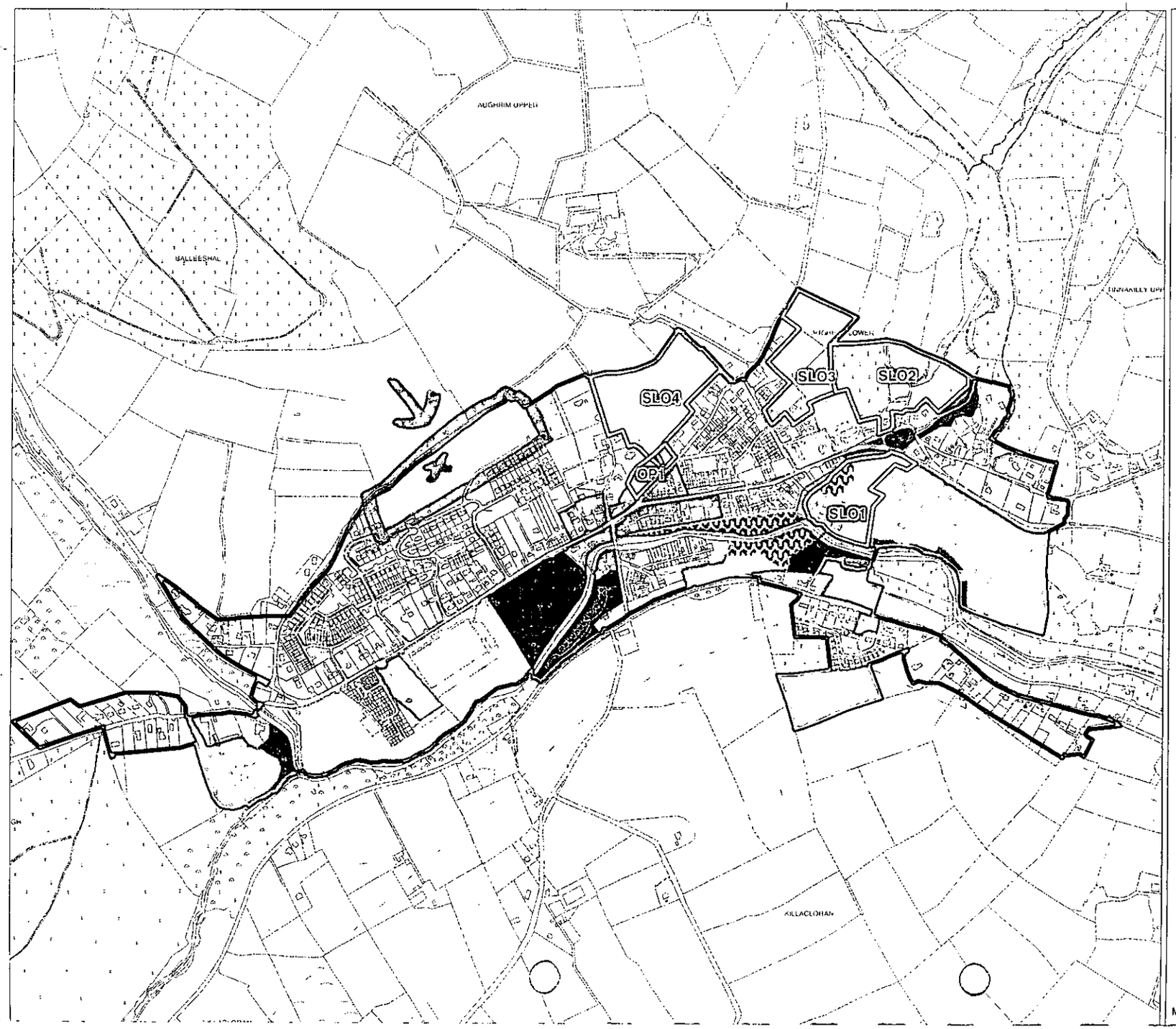
Dear Sorcha,

Following on our recent conversation when I called to examine the proposed development plan at the Arklow Municipal District offices recently. I attach copy of the proposed zoning map for Aughrim and write to confirm that as land owner I am happy with this proposal. The portion of land at the top of the existing Rathmore development on which the existing residential zoning is proposed to be maintained is highlighted in purple marked X on the attached map.

I would hope the existing zoning can be maintained into the future so that low density housing can be constructed on this site once mains sewage capacity is available. This site is ideally placed within the Aughrim boundary and has direct access into the existing road and mains services in the Rathmore development.

Yours sincerely,

Paschal Bermingham



Aughrim Town Plan

DRAFT WICKLOW COUNTY DEVELOPMENT PLAN 2016-2022

- RE Existing Residential
- R15 Residential 15/ha
- R10 Residential 10/ha
- R Special
- TC Town Centre
- E Employment
- CE Community & Education
- AOS Active Open Space
- POS Passive Open Space
- OS Open Space
- T Tourism
- MU Mixed Use
- SLO Specific Local Objective/ OP Opportunity Site
- "Water-compatible" development
- Settlement Boundary

Title: Land Use Zoning Objectives

Maps are not to scale

Wicklow County Council
Planning Department

C20

Leonora Earls

From: Clara Biddle [redacted]
Sent: 10 January 2016 17:01
To: Wicklow Town Plan Review
Subject: Wicklow Harbour Re-vamp

To the administrative officer, Planning Section, Wicklow County Council,

I would just like to express how much I support the plans to re-vamp Wicklow Harbour. This town has such huge potential - It needs some attention and clever planning, but could be transformed by something like this. What a prime spot for tourists and think of the commercial benefits. It's time Wicklow breaks out of it's shell.

Sincerely

Clara

C21

Leonora Earls

From: Kevin Hughes
Sent: 18 February 2016 12:58
To: Planning - Development Plan Review
Subject: Draft WCC Development Plan - Submission in Respect of Lands at Newcastle, Co. Wicklow
Attachments: Blackditch Ltd - Submission on DRAFT Wicklow Development Plan Newcastle 18.02.16.pdf

Dear Sir/Madam,

Please find attached a submission on the draft Wicklow Development Plan 2016-2022 prepared on behalf of Blackditch Ltd. in respect of lands at Newcastle, Co. Wicklow.

I would be obliged if you conform receipt of this submission by reply.

Regards

Kevin Hughes MIPI MRTPI
Director

Hughes Planning & Development Consultants
The Mash House
Distillery Road
Dublin 3

T 00 353 (0)1 533 4211
M 00 353 (0)87 738 0096
E kevin.hughes@hpdc.ie
W www.hpdc.ie

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Hughes Planning & Development Consultants
The Mash House, Distillery Road, Dublin 3
+353 (0)1 533 4211 - info@hpdc.ie – www.hpdc.ie

Senior Executive Officer,
Planning Department,
Wicklow County Council,
County Buildings,
Whitegates,
Wicklow Town,
Co. Wicklow

18th February 2016

Re: Submission on Draft Wicklow Development Plan 2016-2022 in respect of Lands at Blackditch, Newcastle, Co. Wicklow

Dear Sir/ Madam,

On behalf of Blackditch Ltd., Blackditch Farm, Newcastle, Co. Wicklow, Hughes Planning and Development Consultants, The Mash House, Distillery Road, Dublin 3 would like to make this submission in respect of the Draft Wicklow Development Plan 2016-2022 and lands at Blackditch, Newcastle, Co. Wicklow.

The extent of lands in the ownership of Blackditch Ltd. to the southwest of Newcastle town centre is indicated in planning application Reg. Ref.s 141590, 141855 and 15868. The overall landholding includes lands designated for Phase 2 Low Density Residential (3.7 hectares), Community/Educational/Institutional (0.76 hectares) and Employment (2.42 hectares) in the current development plan.

The lands were acquired by Blackditch Ltd. in 2014 with the intent of completing a comprehensive restoration and redevelopment of the existing farm complex before proceeding to bring forward high quality development proposals for the zoned lands. The works to the farm complex as approved under Reg. Ref.s 141590 and 141855 are now substantially complete and represent an exemplar of the potential of the lands and the intentions of the landowner.

The contents of the draft development plan in respect of the lands is extremely disappointing (particularly having regard to the submission made on behalf of Blackditch Ltd at the pre-draft stage) in that the lands has been significantly downgraded to a predominant designation of Tertiary Development Area, with an unworkable area designated as Secondary Development Area. However, most problematic is the introduction of Local Objective NC4: *'to provide a 1.5 ha of Active Open Space that shall be levelled, drained and developed for the provision of a team sports field. No more than 50% of the total development land within the objective boundary shall be developed prior to the provision of the active open space.'*

The effect of the provisions of the draft plan and Local Objective NC4 is to prevent the economic development of the lands. Blackditch Ltd. have no objection to the provision of high quality landscaped open space as part of the development of their lands, but submit that Local Objective NC4 allied with the Tertiary designation of the lands is completely unworkable. This is complicated by the fact that there are a number of landholders within the area affected by Local Objective NC4 and it is difficult to see how an equitable apportionment of the cost of provision of a sports field between each of the landholders could be achieved. It is not appropriate that a single landowner should carry the burden of other landholders in terms of public open space provision as is currently proposed. In addition, it is considered that the projected population growth for Newcastle as set out in the draft development plan of an additional 242 persons by 2022, cannot possibly warrant a second sports field.

Local objective provisions would be better focused on improving the general amenities of Newcastle Villlage, such as pedestrian walkways, lighting and the architectural amelioration of the Newcastle Community Centre, which is something Blackditch Limited would be happy to contribute to.

On this basis, Blackditch Ltd. request that Local Objective NC4 is omitted from the plan and that the Council consider a more balanced allocation of Secondary and Tertiary Development Area lands within the landholding.

I would be obliged if the planning authority would consider this submission in the preparation of the Wicklow Development Plan 2016-2022 and indicate that Blackditch Ltd. Should you have any queries or require any further information please do not hesitate to contact the undersigned.

Yours sincerely,

Kevin Hughes MIPI MRTPI
for HPDC

cc. Blackditch Ltd.

C21

Leonora Earls

From: Kevin Hughes
Sent: 18 February 2016 12:57
To: Planning - Development Plan Review
Cc: Sorcha Walsh; Tim Walsh
Subject: Draft WCC Development Plan - Submission in Respect of Proposed Public Right of Way 6 (PROW6)
Attachments: Blackditch Ltd - Submission on DRAFT Wicklow Development Plan PROW6 18.02.16.pdf

Dear Sir/Madam,

Please find attached a submission on the Draft Wicklow Development Plan 2016-2022 prepared on behalf of Blackditch Ltd. in respect of a proposed public right of way (PROW6) over land in the ownership of Blackditch Ltd.

I would be obliged if you conform receipt of this submission by reply.

Regards

Kevin Hughes MIPI MRTPI
Director

Hughes Planning & Development Consultants
The Mash House
Distillery Road
Dublin 3

T 00 353 (0)1 533 4211
M 00 353 (0)87 738 0096
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Ms. Sorcha Walsh
Senior Planner,
Planning and Development,
Wicklow County Council,
County Buildings,
Whitegates,
Wicklow Town,
Co. Wicklow

18th February 2016

Subject to Contract/Contract Denied

Re: Submission on Draft Wicklow Development Plan 2016-2022 in respect of Proposed Public Right of Way PROW6

Dear Ms. Walsh,

On behalf of Blackditch Ltd., Blackditch Farm, Newcastle, Co. Wicklow, Hughes Planning and Development Consultants, The Mash House, Distillery Road, Dublin 3 would like to make this submission in respect of the Draft Wicklow Development Plan 2016-2022.

We refer to the planning authority's letter dated 26th November 2015 concerning land in the ownership of Blackditch Ltd. (Folio No WW32810F refers). On behalf of our client, Blackditch Ltd, we confirm that there is no objection to the proposed objective within the draft development plan to designate a public right of way over Folio No WW32810F (Proposed Public Right of Way - PROW6).

I further refer to the meeting between our clients and Mr. Tim Walsh, Wicklow County Council on 22nd January 2016 and confirm that in the interest of long term environmental objectives of the planning authority, that Blackditch Ltd would be prepared to cede the land to be subject to the ROW to Wicklow County Council for a nominal amount. This would of course be subject to legal agreement between solicitors acting for the planning authority and those acting for Blackditch Ltd. Please note that this letter does not in any way form a binding contract.

I would be obliged if the planning authority would consider this submission in the preparation of the Wicklow Development Plan 2016-2022. Should you have any queries or require any further information please do not hesitate to contact the undersigned.

Yours sincerely,

Kevin Hughes MIPI MRTPI
for HPDC

cc. Blackditch Ltd.

C22

Wicklow County Development Plan 2016-2022

Development Plan Review

Lands at Kilgarron Hill, Enniskerry, Co. wicklow.

on behalf of Bluetone Properties Limited (in Receivership) c/o William O' Riordan and Declan Mc Donald, Joint Receivers, Pricewaterhousecoopers

19th February 2016

JSA John Spain Associates
Planning & Development Consultants
Chartered Town Planners & Chartered Surveyors

39 Fitzwilliam Place, Dublin 2
Telephone: (01) 662 5803
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Tel 01 662 5803
info@johnspainassociates.com

County Development Plan Review,
Planning Department,
Wicklow County Council,
Station Road,
Wicklow Town.

19th February 2016

Dear Sir/Madam,

RE: WICKLOW COUNTY DEVELOPMENT PLAN 2016-2022 DEVELOPMENT PLAN REVIEW

1.0 INTRODUCTION

1.1 On behalf of our clients Bluetone Properties Limited (in Receivership) c/o William O' Riordan and Declan Mc Donald, Joint Receivers, PriceWaterhouseCoopers we wish to make a submission on the draft Wicklow County Development Plan 2016 – 2022. The submission relates to lands located at Kilgarron Hill, Enniskerry, Co. Wicklow.

1.2 The draft County Plan incorporates the Enniskerry Town Plan, and sets out the relevant policies, objectives and zoning for this settlement. In this regard, the County Plan will effectively replace the current Enniskerry LAP 2009 – 2016 when it is finally adopted.

1.3 The proposed draft County Plan sets out that our client's lands are located within an Action Area Plan Area and sets out specific objectives regarding their future development. Our client has serious concerns in relation to the change to the zoning and other objectives for the lands proposed in the Draft County Plan.

1.4 The proposed draft plan proposes to effectively down zone part of these residential lands. Furthermore, a number of specific objectives are provided for, including the provision of educational and community facilities and employment zoned lands. This submission seeks the retention of the existing residential zoning of the lands and also addresses concerns in

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Executive Director: Erika Casey BA (MOD) MRUP MRTPI MIPI
Associate Directors: Paul Turley BA MRUP Dip Environmental & Planning Law MIPI Stephanie Farrington BA MA (EDS) MRUP MIPI Robert Keran BSc LLB MIPI

John Spain Associates Ltd. trading as John Spain Associates. Directors: J. Spain, S. Spain.
Registered in Ireland No. 396306. Registered Office: 39 Fitzwilliam Place, Dublin 2, D02 ND61.. VAT No. IE 6416306U

Associate Offices: London Manchester Leeds

respect of specific objectives in the draft plan. The detailed grounds of our submission are set out below.

1.5 It will be detailed:

- Enniskerry is the only settlement in Wicklow that has been identified as having a deficit of zoned residential lands. In this context, there is no basis for down zoning existing residential land.

- The subject lands are sequentially the optimal location for residential development. They represent a sustainable and logical extension to the existing built environment, are readily serviced and located in proximity to established social and physical infrastructure. The zoning of the lands is therefore fully consistent with the guidance set out in the Guidelines for Planning Authorities regarding Development Plans published in 2007.

- The lands are also appropriately located in the context of the asset test set out in Box 5.2 of the National Spatial Strategy. This sets out an evaluation framework for the most appropriate spatial location of housing land. The subject site fulfils all of the criteria specified.

- The subject lands have been subject of a detailed ecological assessment including a full Natura Impact Report. This identifies that a large portion of the lands proposed for down zoning are located within an area of low and moderate ecological sensitivity and are entirely suitable for development. A portion of the lands to be down zoned are located within an area of high ecological sensitivity. It is proposed in this submission that these lands be retained for open space.

- In this regard these lands should not be precluded from the AAP Boundary and the full extent of the zoning should be reinstated.

2.0 SITE LOCATION AND DESCRIPTION

2.1 The subject lands are located at Kilgarron Hill which is a short distance to the north west of the traditional Enniskerry town core. The lands are greenfield in nature. Knocksink Woods cSAC is located to the north east of the lands. The lands are primarily in agricultural use. To the south, the lands abut the existing GAA pitch and grounds which have an area of c. 2 ha. The southern boundary of the site is formed by the Enniskerry to Glencree Road (L011). To the west, is the Park na Sillogue Court development of local authority housing. To the east, the site adjoins the grounds of St. Mary's Church and the adjoining primary school of St. Mary's and St. Gerard's. Fig. 1 indicates the location of our client's lands and the land ownership pattern in the context of the existing LAP zoning.

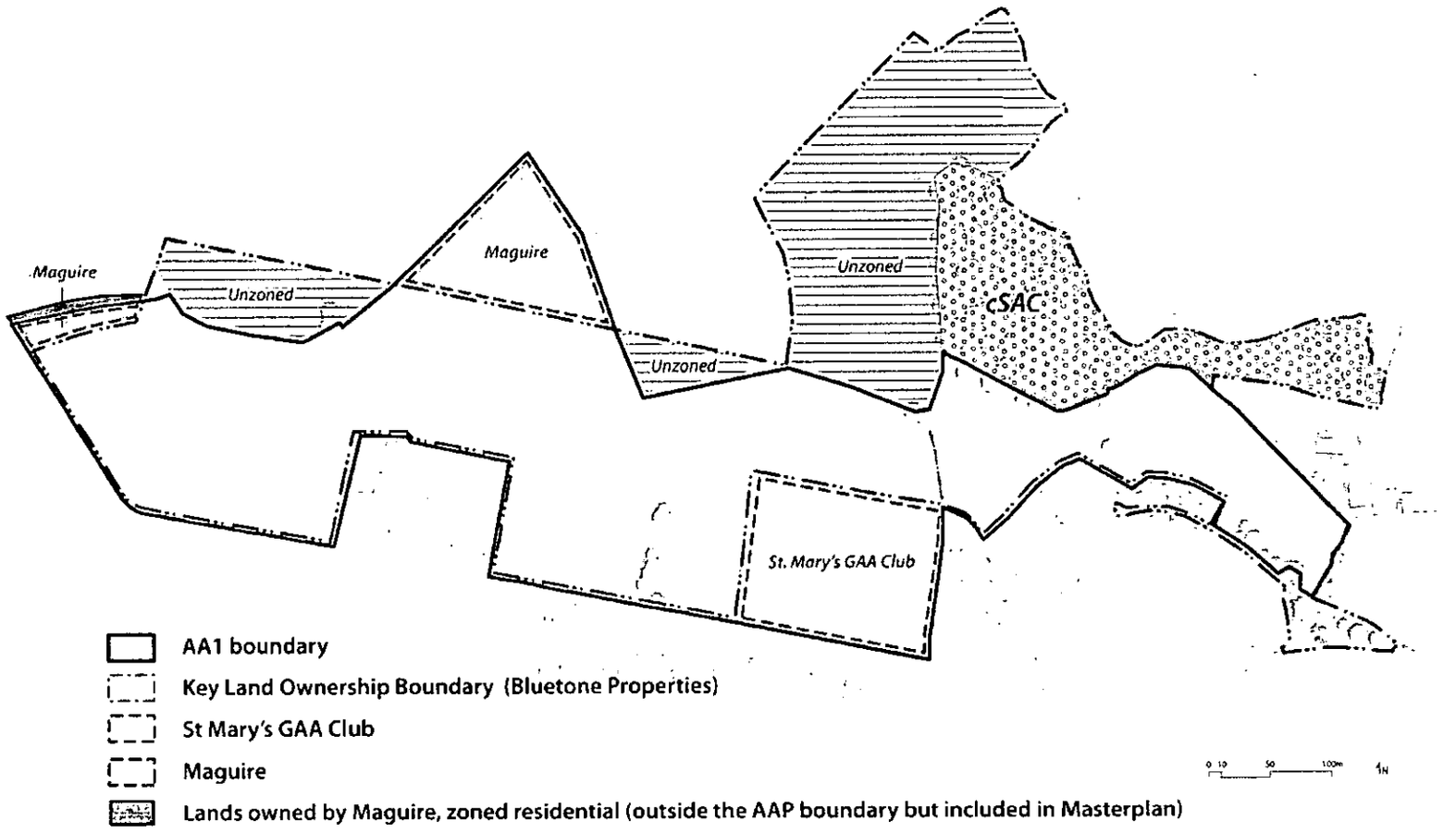

Fig. 1: Land Ownership

3.0 EXITING STATUTORY CONTEXT

Enniskerry LAP 2009-2016

3.1 Under the current Enniskerry LAP 2009 – 2016, the subject lands are located within an area designated for the preparation of an Action Area Plan. It is stated that development on the AAP lands is to be the subject of comprehensive and integrated scheme of development and that the lands shall be developed as a residential, open space, employment and community zone.

3.2 The LAP sets out a number of specific objectives for the lands which are summarised below:

"A minimum area of 2ha shall be reserved as Active Open Space (this is the size of the area currently occupied by Enniskerry GAA). In the event of the relocation of the GAA to an alternative location, this quantum of AOS shall, as a minimum, be maintained within the overall action area. Any alternative AOS shall be maintained available for general public use, shall be suitably sized to allow for organised sporting activities i.e. pitches, courts etc. and shall be so located within the action area so as to be easily accessible by the wider community. (Any proposals to redevelop the existing GAA grounds will only be considered when the Council has been satisfied that suitable alternative lands have been secured for this sporting facility).

- *A minimum of 1.2ha shall be provided for either the extension or relocation and expansion of St. Mary's and St. Gerard's national school.*
- *A minimum of 0.4ha shall be provided for a community uses, including a community centre of not less than 500 sq. m. and an equipped playground of not less than 400 sq. m.*
- *A minimum of 1ha shall be provided for employment uses. Generally, this shall comprise office/studio/surgery type development of the highest architectural quality and layout. A minimum of 0.4ha of this area shall however be reserved for local service and incubator businesses.*
- *The car park associated with the employment area shall be so located and designed to facilitate tourist use during non-business hours and shall at all times remain available and open for this use.*
- *A maximum of 210 residential units may be provided on the remainder of the site (c. 12ha), of which a minimum area of 3ha shall be strictly reserved for lower density housing at a maximum density of 10/ha. A full range of unit sizes, including smaller 1 and 2-bedroomed units shall be provided and no more than 50% of the units shall exceed 3 bedrooms or 125 sq. m. in size.*
- *The development shall be delivered in phases such that adequate education, community and employment facilities are provided for each phase; in particular, the school site shall be provided in Phase 1 accompanied by no more 25% of the residential development and the employment facilities shall be provided no later than Phase 2 accompanied by no more than an additional 50% of the residential units*

- *A maximum of two vehicular access points onto Local Primary Road L1010 (Enniskerry – Glencree) shall be permitted.*
- *To achieve a sense of place and allow for visual diversity any residential application should provide for a number of identifiable and distinct housing estates (not exceed 60 units), each containing different house designs within an overall unified theme.*
- *Full geotechnical and archaeological assessment of the lands shall be undertaken prior to any development taking place.*

3.3 Fig. 2 is an extract from the existing LAP map indicating the extent of lands within the AA1 area.

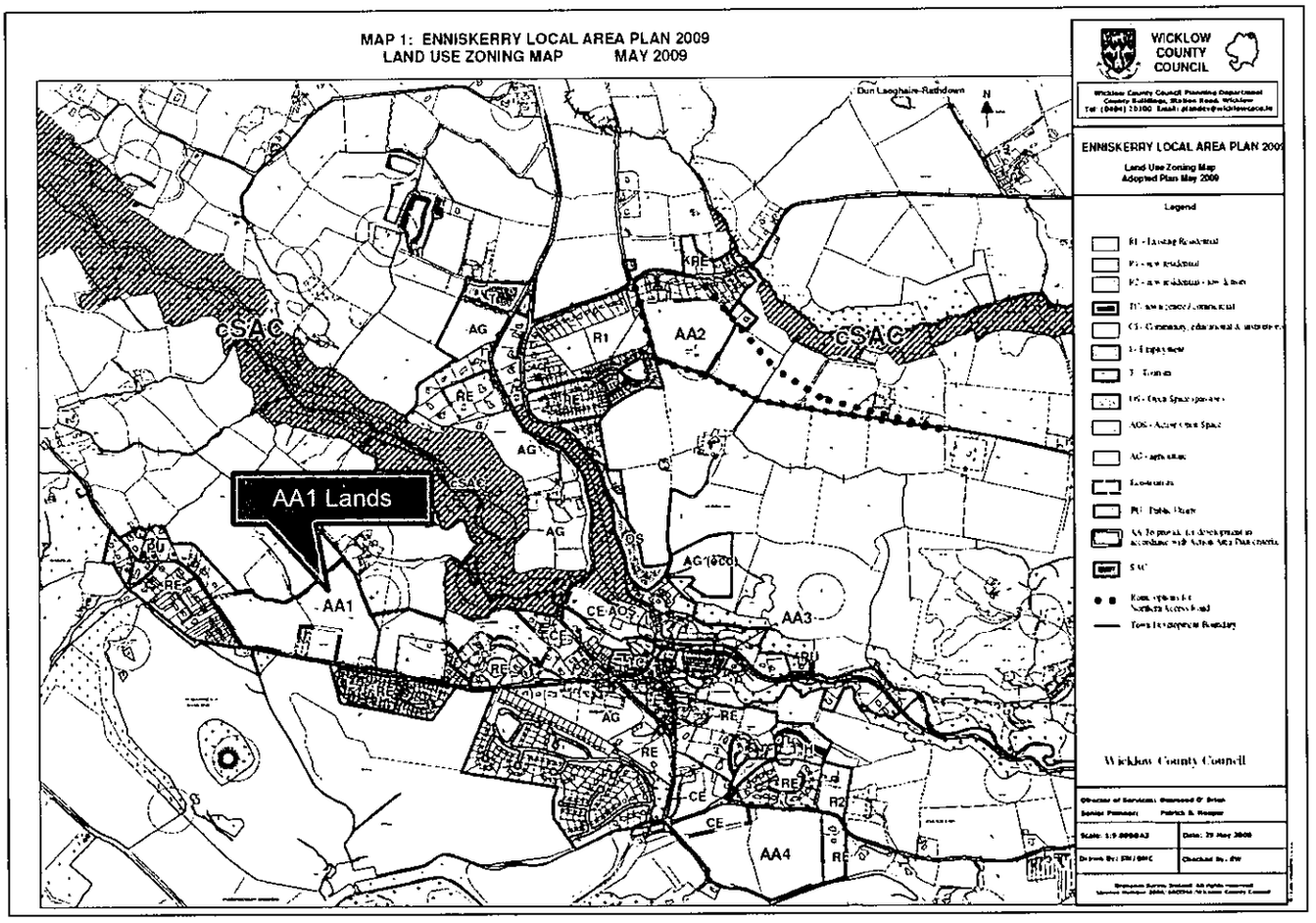

Fig 2: Extract from Enniskerry LAP 2009 – Zoning Map

3.4 Our clients have prepared a detailed draft AAP for the subject lands which is under consideration by the Council. In support of this plan a detailed ecological assessment and full Natura Impact Report (NIR) was undertaken by Scott Cawley which fully assessed the potential implications of this zoned land on the adjacent cSAC. A copy of the NIR is contained in Appendix 1.

4.0 PROPOSED DRAFT WICKLOW COUNTY DEVELOPMENT PLAN 2016-2022

4.1 Under the draft County Plan, the Enniskerry LAP has been incorporated into the main County Plan and it is proposed that there will be no separate statutory LAP. The draft plan sets out a number of specific objectives regarding the lands. It is noted that the proposed draft plan provides for a number of significant amendments to that currently set out in the Enniskerry LAP 2009, particularly with regard to the extent of the AAP lands and also the future provision of housing that can be accommodated on the lands. The draft plan is also more prescriptive in terms of the zoning of the lands. Fig. 3 is an extract from the draft County Plan. Fig. 4 is an extract from the current LAP.

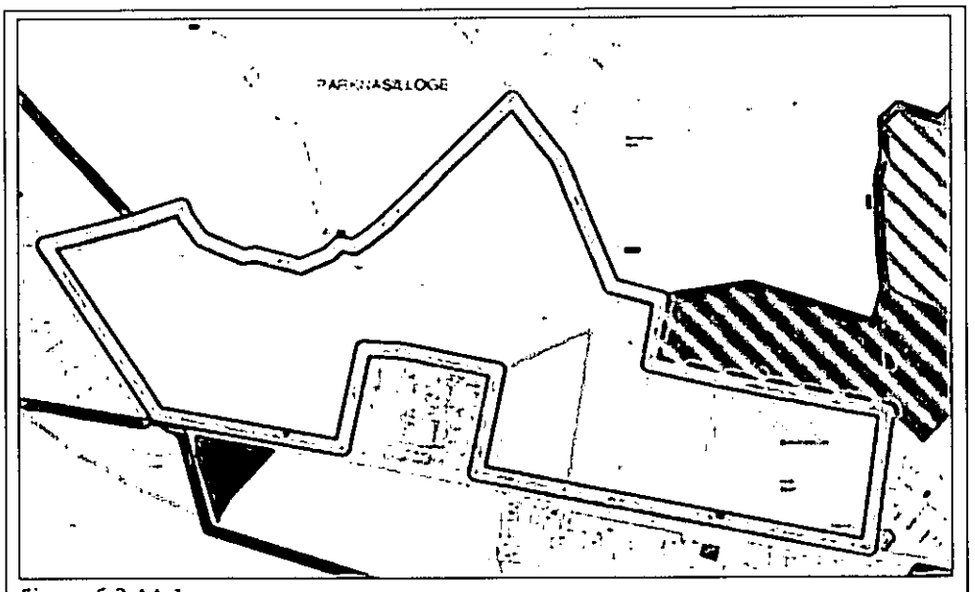

Figure 6.2 AA 1

Fig. 3: Extract from Draft County Development Plan 2016-2022 indicating extent of AA1 lands

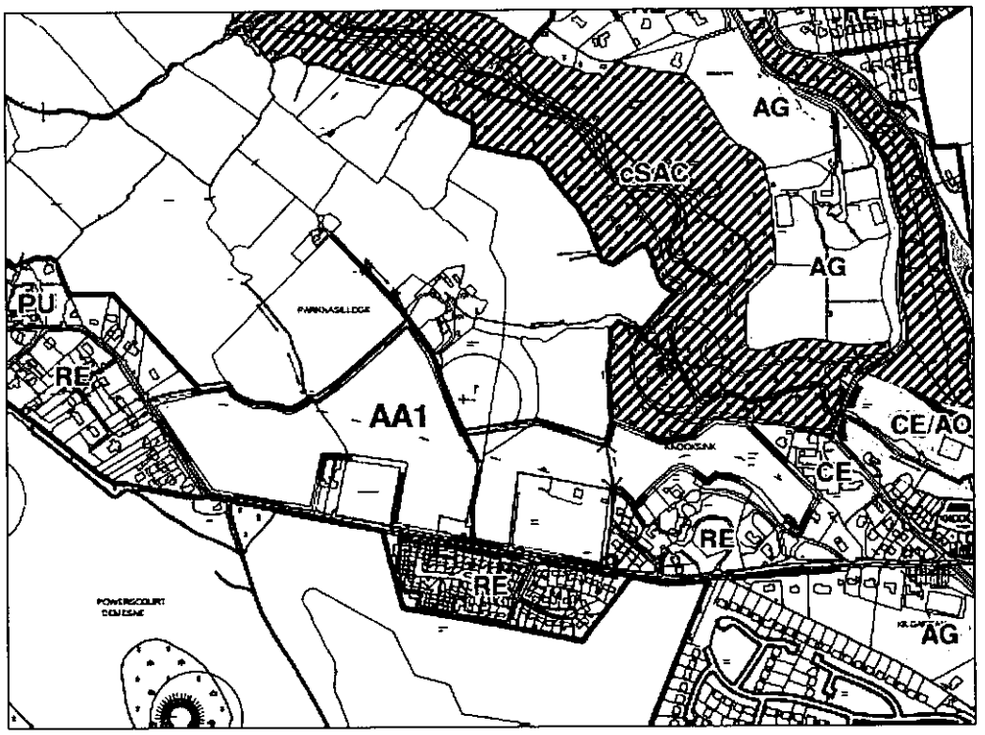

Fig. 4: Extract from LAP 2009-2016 indicating extent of AA1 lands

4.2 As can be seen from this extract, the draft plan prescribes zones for the proposed residential, employment, open space and community uses. In contrast under the current LAP (see figure 4 above) land use zonings are not specifically prescribed. In particular, exact locations for the employment and community uses are not specified.

4.3 The extent of the AAP 1 lands set out in the draft County Plan has significantly reduced from the current LAP. Effectively all the lands to the south of Knocksink Woods, and the lands to the immediate north and east of the GAA pitch are no longer zoned for development. This land is now zoned passive open space and is designated a conservation area.

4.4 In addition, the current 2009 LAP provides that up to 210 dwellings could be accommodated on the lands, whereas the current draft County Plan suggests a maximum of 156 units. The extent of community and employment zoning is not reduced to reflect the reduction in housing units. There is no explanation provided in the plan as to why these amendments have been made or rationale as to why the extent of the AA1 Lands and the quantum of residential development have been reduced.

4.5 The draft plan provides the following commentary. Key amendments to the current LAP are highlighted in bold:

"*This action area is located west of Enniskerry town centre and immediately north of Kilgarron housing development, in the townland of Parknasilloge. This action area measures c. 12.5ha. This action area shall be developed*

as a residential, open space, employment and community zone in accordance with the following criteria:

- *A minimum area of 2ha shall be reserved as Active Open Space (this is the size of the area currently occupied by Enniskerry GAA). In the event of the relocation of the GAA to an alternative location, this quantum of AOS shall, as a minimum, be maintained within the overall action area. Any alternative AOS shall be maintained available for general public use, shall be suitably sized to allow for organised sporting activities i.e. pitches, courts etc and shall be so located within the action area so as to be easily accessible by the wider community. (Any proposals to redevelop the existing GAA grounds will only be considered when the Planning Authority has been satisfied that suitable alternative lands have been secured for this sporting facility).*
- ***A minimum of 1.2ha shall be reserved for education use.***
- *A minimum of 0.4ha shall be provided for a community uses, including a community centre of not less than 500sqm and an equipped playground of not less than 400sqm.*
- *A minimum of 1ha shall be provided for employment uses. Generally, this shall comprise office/studio/surgery type development of the highest architectural quality and layout. A minimum of 0.4ha of this area shall however be reserved for local service and incubator businesses.*
- *The car park associated with the employment area shall be so located and designed to facilitate tourist use during non-business hours and shall at all times remain available and open for this use*
- ***A maximum of 156 residential units may be provided on the remainder of the site (c.7.8ha).***
- *The development shall be delivered in phases such that adequate education, community and employment facilities are provided for each phase; in particular, the school site shall be provided in Phase 1 accompanied by no more 25% of the residential development and the employment facilities shall be provided no later than Phase 2 accompanied by no more than an additional 50% of the residential units.*
- *A maximum of two vehicular access points onto Local Primary Road L1010 (Enniskerry – Glencree) shall be permitted.*
- *To achieve a sense of place and allow for visual diversity any residential application should provide for a number of identifiable and distinct housing estates (not exceed 60 units), each containing different house designs within an overall unified theme.*
- *Full geotechnical and archaeological assessment of the lands shall be undertaken prior to any development taking place."*

4.6 Our client has a number of specific concerns regarding the proposed amendments to the AA1 Lands set out in the Draft County Plan, most notably regarding the extent of lands zoned for development within the AA1 lands, the reduction in development quantum and the prescribed nature of the zoning. Our client also has concerns regarding the objectives regarding employment and educational facilities. The detailed grounds of our submission are set out below.

5.0 EXTENT OF AAP LANDS AND QUANTUM OF DEVELOPMENT

5.1 The extent of lands within the AAP1 boundary in the draft plan have significantly reduced compared to that currently designated under the LAP 2009. It is noted that all of the lands to the north of the existing GAA pitch as well the lands to the east adjacent to Knocksink Woods are no longer within the AAP1 boundary. The quantum of permitted housing has reduced from 210 to 156 units. Fig. 5 is an extract from the current County Plan indicating the lands now excluded from the AA1 boundary.

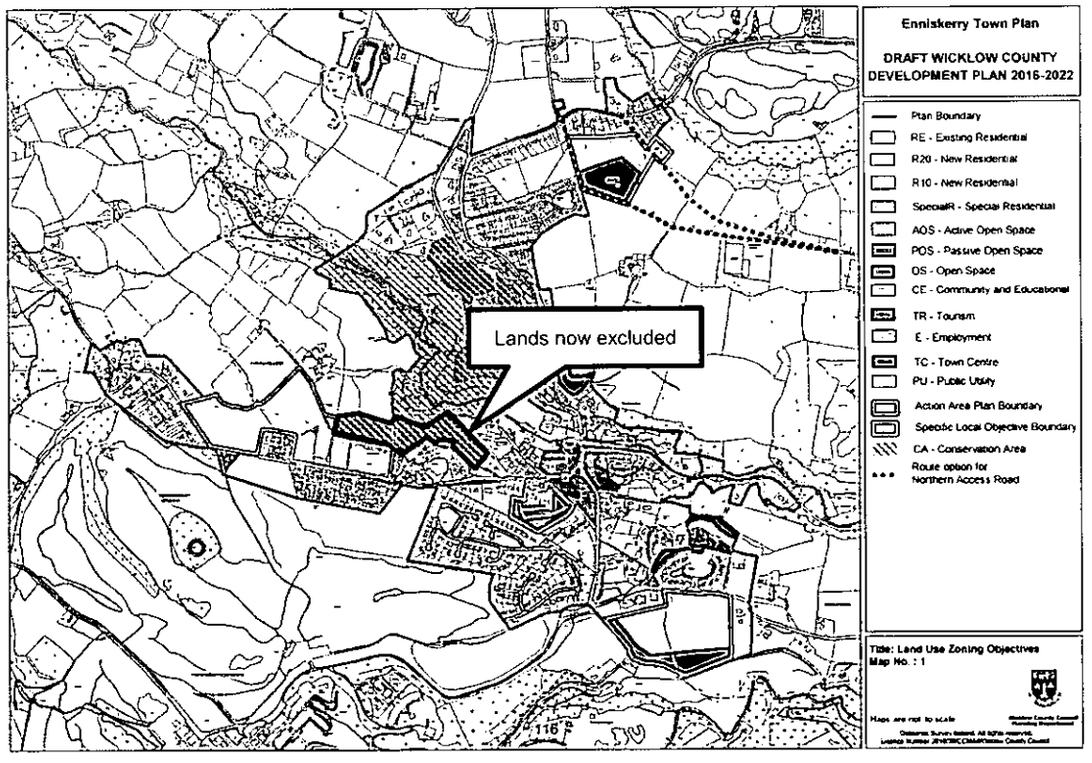

Fig. 5: Extract from County Development Plan 2016 indicating extent of lands excluded from AAP boundary

5.2 We have reviewed the core strategy of the draft Wicklow County Plan. Under the strategy, Enniskerry is identified as a small growth town – Level 5. It is estimated that the population of the town will grow from 1,940 persons to 2,500 persons by 2028.

5.3 It is noted that the draft plan states:

"Level 5: The majority of the town plans adopted for these towns prior to the review of this County Development Plan had a surplus of zoned land having regard to the population and housing targets set out in this plan. This was in the main due to the revised population targets included in this plan, as well as previous take up of land for housing development altering the headroom proportion. Where a surplus was identified, the surplus land has been either re-designated for an alternative, non-residential use, or as a 'Strategic Land

Bank' (SLB). ***The only exception is Enniskerry where a deficit was identified. Therefore the new Enniskerry town plan forming part of this CDP includes additional zoned land to address this deficit****. (our emphasis)."*

5.4 Therefore as explained in the text of the Development Plan there is no justification whatsoever in principle to down zone land residential zoned land in Enniskerry. We note that the LAP zones other lands within the town for residential which is a further indication of the shortage of residential zoned lands in the town. It is considered that the subject lands should not be down zoned in lieu of lands elsewhere as they are sequentially the most preferential location for residential development in the town. The subject lands are in very close proximity to the village centre, local services and amenities, public transport and other social and physical infrastructure. If it is considered by the Council that the reinstatement of the zoning on the subject lands would result in a surplus of residential zoned lands elsewhere, than the other lands proposed for rezoning from agriculture to residential in the Draft Development Plan should not be brought forward.

5.5 It would not be appropriate to down zone our clients lands simply to upzone other lands less well located in the context of the criteria set out in the Guidelines for Planning Authorities regarding Development Plans. The subject lands at Kilgarron Hill are particularly well located in close proximity to the town centre, schools, GAA grounds and other amenities.

5.6 Table 2.8 of the draft plan sets out that the housing unit growth requirement in the town by 2022 is 475 units.

5.7 The draft plan states:

"In deciding how the town should develop there are many options given the fashion of its spatial development history. The key parameter however, must be based on environmental protection, sustainability and developing the town in a manner that would generate the minimal number of car journeys. The solution adopted in this Plan is to designate residential lands as close as possible to the town centre and existing community facilities whilst avoiding the environmentally sensitive and EU designated areas (Knocksink Wood and Ballyman Glen are both SACs), with new employment being located on existing zoned land to the west of the settlement.

In recognition of the above this plan has aimed to consolidate the existing built pattern in Enniskerry by maximising the potential of large sites close to the settlement core and any infill sites along the main roads within the settlement. The designation of specific lands for residential development has been provided in a manner that facilitates greater connectivity between the settlement core and the existing developed lands within the plan area. Sufficient lands have been zoned in order to meet the projected population targets as set out in the Core Strategy of this plan."

5.8 In this regard, it is clear that Enniskerry is a settlement where there is a deficit of zoned land to meet projected demand. Notwithstanding this, the Council have down zoned part of the AAP1 lands and reduced the quantum of development achievable on these lands. Whilst not explicitly stated, it is assumed that this has occurred due to the proximity of the subject lands to Knocksink Woods which is a candidate SAC.

5.9 It is respectfully submitted that in this instance the reduction of the extent of lands within the AAP1 lands is inappropriate, particularly as sequentially they are the most suitable and appropriate location for residential development in Enniskerry. As noted above, a detailed draft Action Area Plan for the subject lands in accordance with the objectives of the 2009 LAP has been undertaken and is currently under consideration by Wicklow County Council. In the preparation of this draft AAP a detailed Natura Impact Report and ecological assessment was undertaken in respect of the AAP1 lands as defined by the 2009 LAP. A copy of this document is appended in Appendix 1. Figure 6 below is an extract from the Natura Impact Statement which details the ecological sensitivity of the AAP1 lands. This clearly identifies that the lands to the north of the existing GAA pitch are located within an area of **low** environmental sensitivity and indeed that lands identified as being moderately sensitive are zoned for development.

5.10 The areas to the east immediately adjacent to the Knocksink Wood cSAC are identified as an area of high ecological sensitivity. A small portion to the far east of the lands is identified as being of moderate ecological sensitivity.

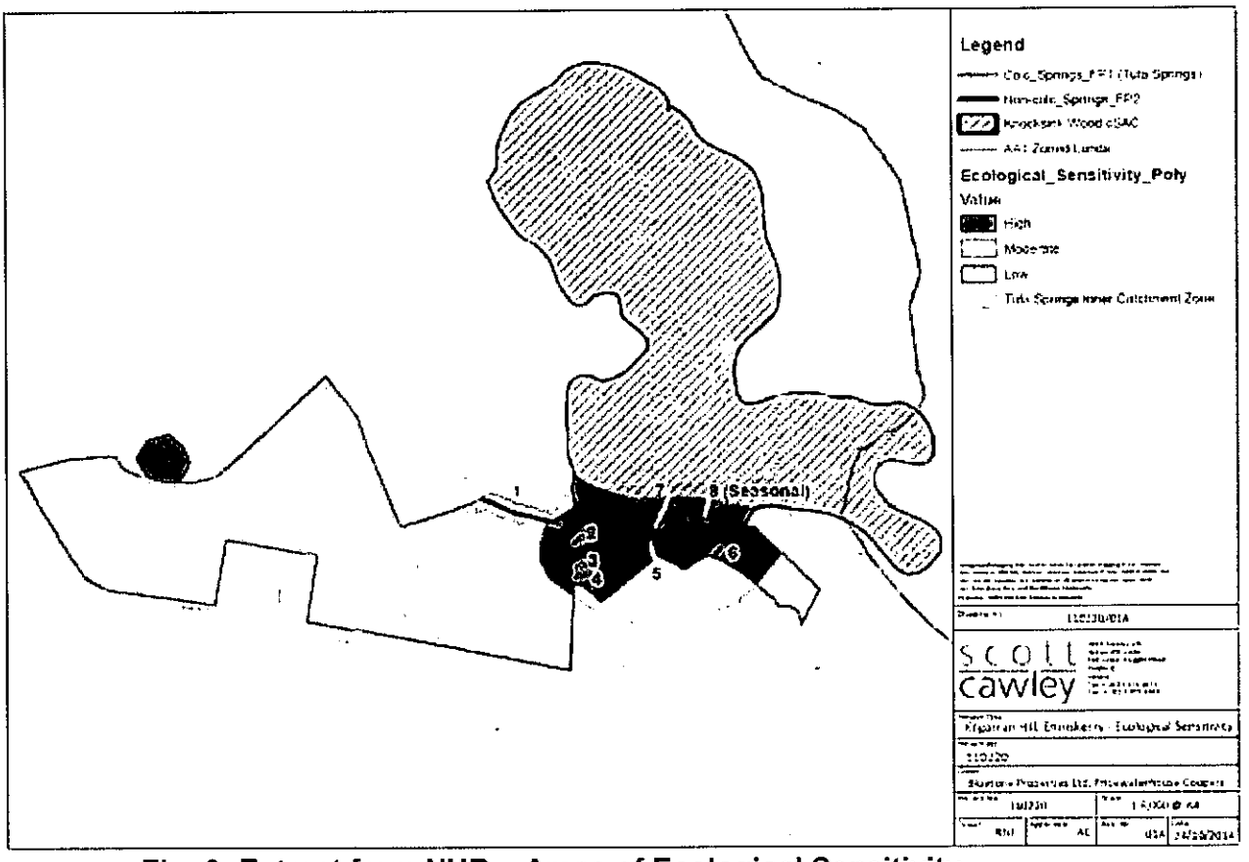

Fig. 6: Extract from NUR – Areas of Ecological Sensitivity

5.11 A detailed Natura Impact Report has been prepared by Scott Cawley. The report concludes that if the specific objectives and mitigation measures are adhered to in the implementation of the proposed Action Area Plan that it can be concluded that the area of the AAP as originally proposed and set out in the current Enniskerry LAP will not have an adverse effect on the integrity of the cSAC.

5.12 In this context, it is respectfully submitted that the lands to the immediate north of the GAA pitch be retained within the AAP1 boundary. These lands have clearly been identified as being of low ecological sensitivity and are appropriate for residential development.

5.13 With regard to the lands located to the east within the area of high ecological sensitivity, it is proposed that these are retained within the AAP boundary but designated for the provision of passive open space. The lands to the far east which are designated as of moderate ecological sensitivity should also be retained within the AAP Boundary and identified as appropriate for residential use.

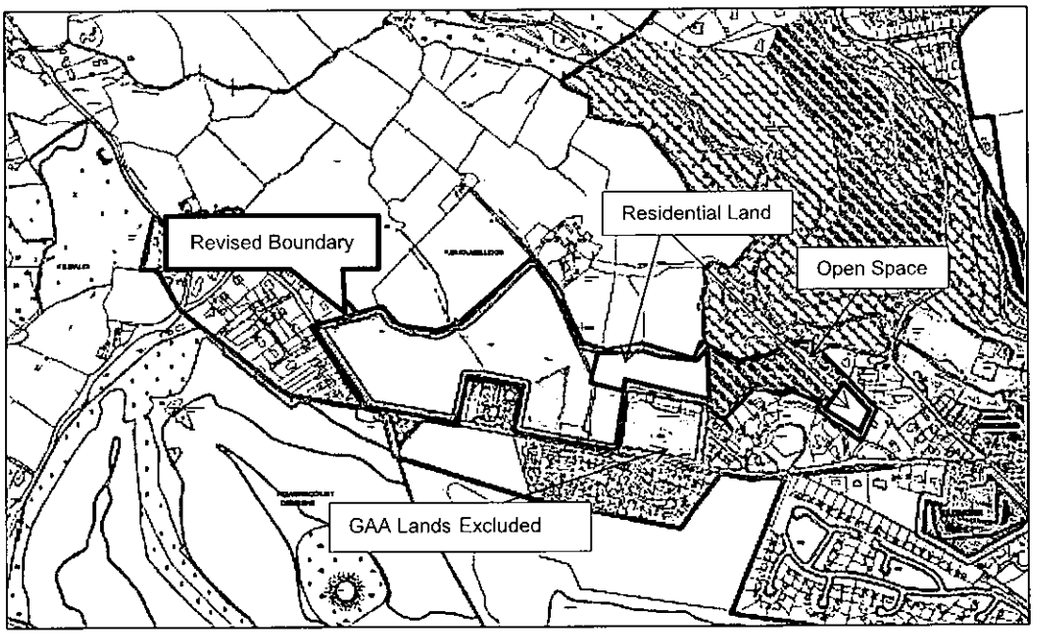

Fig. 6: Proposed revisions to AAP1 boundary

5.14 To support our submission that the lands should be included within the AAP boundary we enclose with this submission a further report by Scott Cawley in Appendix 2. This outlines that the majority of the lands i.e. those located to the immediate north of the GAA pitch are of low ecological value and thus this should not be a reason to exclude this area from future proposed development.

5.15 The proposed revisions to the AAP1 boundary in the draft County Plan are also in accordance with the guidance set out in the Guidelines for Planning Authorities regarding Development Plans published in 2007. With regard to the sequential approach to zoning the guidelines state in para 4.19:

"In order to maximise the utility of existing and future infrastructure provision and promote the achievement of sustainability, a logical sequential approach should be taken to the zoning of land for development.

(i) Zoning should extend outwards from the centre of an urban area, with undeveloped lands closest to the core and public transport routes being given preference (i.e. leapfrogging to more remote areas should be avoided.

(ii) A strong emphasis should be place on encouraging infill opportunities and better use of underutilised lands; and

(iii) (area to be zoned shod be contiguous to existing zoned development lands.

Only in exceptional circumstances should the above principles be contravened, for example, where a barrier to development is involved such as a lake close to a town. Any exceptions must be clearly justified by local

circumstances and such justification mist be set out in the written statement of the development plan."

5.16 The appropriateness of the subject lands should also be considered in the context of the asset test set out in Box 5.2 of the National Spatial Strategy. It is submitted that the inclusion of the subject lands within the AAP1 boundary would fulfill all of these criteria.

5.17 In this context it is evident that the subject lands represent the most logical and sequentially appropriate lands within the settlement. They are the closest lands to the existing town core of Enniskerry. Based on the detailed ecological reports prepared in relation to the lands there is no clear justification for their down zoning. The majority of the lands are located in an area identified as being of low or moderate ecological sensitivity and thus appropriate for residential development. The portion of the lands that is in a higher area of sensitivity is suitable for passive open space.

6.0 ZONING DESIGNATIONS

6.1 It is noted that the draft County Development Plan includes a specific zoning map for Enniskerry and in particular designates particular zones for employment use and community use. It is submitted that the plan should not be so prescriptive and should allow for the detailed allocation of lands uses to be set out in the approved Action Area Plan for the lands.

6.2 It is noted that the Action Area Plan Guidelines published by Wicklow County Council state:

"that when preparing an AAP it is important that the following issues are addressed:

- *Zonings contained within the action area."*

6.3 It is also stated:

"A series of drawings should be submitted, which should detail the following items:

- *The zoning of each part of the action area, including the size of each particular zoning.*

6.4 In this regard it is submitted that the draft plan should be amended to exclude the specific employment and community zoning objectives within the AAP lands and that the approach of the current LAP where no zonings are prescribed should be adopted.

7.0 EDUCATION OBJECTIVE

7.1 The draft plan stated that a *"minimum of 1.2ha shall be reserved for education use"* within the AAP 1 boundary.

7.2 The current LAP also provides for the provision of a school and states: *A minimum of 1.2ha shall be provided for either the extension or relocation and expansion of St. Mary's and St. Gerard's national school*

7.3 The objective regarding school provision therefore arose due to the proximity of the subject lands to the existing St. Mary's and St. Gerard's National School.

7.4 We understand however, from discussions with the Department of Education and skills that whilst there is still a requirement for the provision of a school site within Enniskerry, that the subject lands immediately adjacent to the existing schools is not deemed appropriate for a school development due to the environmental and ecological sensitivity of these lands.

7.5 It is respectfully submitted that as part of the development review process the Council should undertake a complete review of the zoned lands within Enniskerry to determine the optimal location for a school site. The subject lands whilst proximate to the existing national schools may not be the optimal location for the development of a new school. Until such an audit is complete, it is respectfully submitted that the objective regarding the provision of a school site should be omitted.

8.0 EMPLOYMENT OBJECTIVES

8.1 The draft plan includes the following objective regarding the lands:

- *A minimum of 1ha shall be provided for employment uses. Generally, this shall comprise office/studio/surgery type development of the highest architectural quality and layout. A minimum of 0.4ha of this area shall however be reserved for local service and incubator businesses.*

8.2 It is apparent that this objective was carried over from the existing LAP without any real consideration of the viability or appropriateness of this land use at this location.

8.3 It is also noted that provision of such employment land uses is tied to the proposed phasing of the residential component of the lands and states:

- *The development shall be delivered in phases such that adequate education, community and employment facilities are provided for each phase; in particular, the school site shall be provided in Phase 1 accompanied by no more 25% of the residential development and the* ***employment facilities*** *shall be provided no later than Phase 2 accompanied by no more than an additional 50% of the residential units.*

8.4 It is respectfully submitted that at present there is no market demand for employment of facilities of any scale at this location in what can be described as an emerging residential location. We enclose correspondence from DTZ in Appendix 3 which outlines the absence of any existing or future

potential market demand for this type of employment land use at this location. Any such activities are more appropriately located in the core commercial area in order to benefit from critical mass and footfall; and not in a location peripheral to the commercial core where there is no demand and which in any event would undermine the viability of the established commercial activities in the town centre.

9.0 GAA LANDS

9.1 The subject AAP lands include the existing GAA pitch. We understand from discussions with the GAA that they do not intend to relocate the existing pitch at present. It is well located and easily accessible for the community. In this regard, there is no requirement that the GAA lands be included within the AAP boundary given that their status quo will be maintained. As a matter of course during the preparation of a planning application, consultations would take place with adjoining landowners.

10.0 CONCLUSIONS

10.1 In conclusion, the proposed draft County Plan proposes a significant amendment to the proposed development boundary of the AAP 1 lands. The extent of the lands designated for development has been reduced significantly and the number of houses it is proposed to accommodate has reduced from 210 units to 156 units.

10.2 It has been detailed in this submission that such a reduction is not warranted, particularly in consideration of the Council's acknowledgement that there is a deficit of zoned land in the town and therefore no requirement to reduce the extent of zoned residential land. The subject lands due to their proximity to the town centre are highly suitable and the most appropriate location for residential development.

10.3 A detailed ecological report and Natura Impact Report for these lands have been prepared. This clearly indicates that much of the land to the immediate north of the GAA pitch is of low ecological sensitivity and there is no justification for its down zoning on environmental or ecological grounds. With regard to the lands of high environmental sensitivity, it is envisaged that this would be retained for passive open space. In this regard the subject lands should not be precluded from the AAP Boundary.

10.4 Furthermore, in terms of the sequential development of the town, the lands are optimally located in this regard.

10.5 In relation to the draft County Plan, our client also has concerns regarding the prescribed nature of the zoning particularly in relation to employment and community land uses. It is submitted that this is a matter of detail that should be set out in the approved AAP for the lands rather than being prescribed at County Plan level.

10.6 In terms of the education objective, this appears to be based solely on the proximity of the lands to the existing primary schools. It is submitted that a full and detailed audit should be carried out to determine the optimal location for a primary school in the town.

10.7 The inclusion of a specific objective regarding the provision of employment space at this location is economically unviable. There is no market demand for such space in a peripheral commercial location which in any event will compete with the commercial activities in the town centre.

10.8 Finally it is submitted that the existing GGA pitch is excluded from the AAP boundary as there are no proposals to relocate it within the AAP boundary.

10.9 We would be grateful if our submission could be considered in the preparation of the plan.

Yours sincerely,

John Spain Assoc.

John Spain Associates

Appendix 1

Natura Impact Report

scott cawley

NATURA IMPACT REPORT
PROVISION OF INFORMATION FOR THE APPROPRIATE ASSESSMENT OF PROPOSED ACTION AREA PLAN AT KILGARRON ENNISKERRY

Prepared For
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TABLE OF CONTENTS

1 Introduction 3
2 Methodology 3
3 Stage One- Screening 4
3.1 Background 4
3.2 Overview of Proposed AAP and Receiving Environment 5
3.2.1 Brief Site Description 5
3.2.2 Features of the Site and Environs 6
3.2.3 Description of the Proposed AAP 8
3.2.4 Preliminary Description of Waste Water Treatment within AA1 9
3.2.5 Designated sites in the surrounding area 10
3.4 Identification of European Sites and their Relevance to the Proposed Development 25
3.5 Summary of Screening Conclusions 25
4 Stage Two: Provision of information for an Appropriate Assessment 26
4.1 Knocksink cSAC 26
4.1.1 Conservation objectives 26
4.1.2 Knocksink Wood SAC (000725) 26
4.1.3 Condition of site and management 27
4.1.4 Interest features potentially exposed to risk 28
4.1.5 Catchment Zone for the Knocksink Woods Tufa Springs within the AAP 28
4.2 Potential risk to site resulting from Project 29
4.2.2 Potential impacts from the AAP upon the European Site 29
4.2.3 Potential 'in-combination' effects 30
4.2 AAP Objectives - Negating Impacts upon Knocksink Wood cSAC 31
4.3 Assessment of impacts on Conservation Objectives. 34
5 Conclusions of Assessment Process 36
6 References 37
APPENDIX A – Dr. Les Brown Hydrogeological Characterisation Study 38
APPENDIX B – Scott Cawley Ecological Assessment and Dr. J. Denyer Botanical Assessment 39

1 Introduction

This report, which contains information required for the competent authority (in this instance Wicklow County Council) to undertake an Appropriate Assessment (AA), has been prepared by Scott Cawley Ltd. on behalf of PricewaterhouseCoopers. It provides information on and assesses the potential for the proposed Action Area Plan (AAP) to impact on European Sites[1].

It is necessary that the proposed plan has regard to Article 6 of the *Council Directive 92/43/EEC of 21 May 1992 on the Conservation of Natural Habitats and of Wild Fauna and Flora* (as amended) (hereafter referred to as the Habitats Directive). This is transposed in Ireland primarily by *S.I. No. 477 of 2011, European Communities (Birds and Natural Habitats) Regulations 2011* (hereafter referred to as the Birds and Habitats Regulations) and by the *Planning and Development (Amendment) Act 2010,* as amended (hereafter referred to as the Planning Acts).

2 Methodology

This Natura Impact Report (NIR) has been prepared with regard to the following guidance documents where relevant:

- *Appropriate Assessment of Plans and Projects in Ireland - Guidance for Planning Authorities.* (Department of Environment, Heritage and Local Government, 2010 revision).
- *Appropriate Assessment under Article 6 of the Habitats Directive: Guidance for Planning Authorities.* Circular NPW 1/10 & PSSP 2/10.
- *Assessment of Plans and Projects Significantly Affecting European Sites: Methodological Guidance on the Provisions of Article 6(3) and (4) of the Habitats Directive 92/43/EEC* (European Commission Environment Directorate-General, 2001); hereafter referred to as the EC Article 6 Guidance Document. The guidance within this document provides a non-mandatory methodology for carrying out assessments required under Article 6(3) and (4) of the Habitats Directive.
- *Managing European Sites: The Provisions of Article 6 of the Habitat's Directive 92/43/EEC* (EC Environment Directorate-General, 2000); hereafter referred to as MN2000.
- *Guidance Document on Article 6(4) of the Habitats Directive 92/43/EEC. Clarification of the Concepts of Alternative Solutions, Imperative Reasons of Overriding Public Interest, Compensatory Measures, Overall Coherence.* Opinion of the European Commission (European Commission, January 2007).
- *Guidelines for Good Practice Appropriate Assessment of Plans Under Article 6(3) Habitats Directive* (International Workshop on Assessment of Plans under the Habitats Directive, 2011).

This NIR was based on a desktop study conducted during April 2014. A number of site visits were also conducted (during the period of April to July 2014) at this site as part of the assessments carried out to identify and mitigate for ecological impacts which might arise as a result of this AAP. Sources of information relied upon are listed below.

[1] European sites (also known as Natura 2000 sites) are defined under the Habitats Directive (Article 3) as a European ecological network of special areas of conservation composed of sites hosting the natural habitat types listed in Annex I and habitats of the species listed in Annex II. The aim of the network is to aid the long-term survival of Europe's most valuable and threatened species and habitats. In Ireland these sites are designated as European sites - defined under the Planning Acts and/or Birds and Habitats Regulations as (a) a candidate site of Community importance, (b) a site of Community importance, (c) a candidate special area of conservation, (d) a special area of conservation, (e) a candidate special protection area, or (f) a special protection area. They are commonly referred to in Ireland as candidate Special Areas of Conservation (cSACs) and Special Protection Areas (SPAs).

Desktop Data / Information Sources:

- Ordnance Survey of Ireland mapping and aerial photography available from www.osi.ie;
- Online data available on European Sites as held by the National Parks and Wildlife Service (NPWS) from www.npws.ie;
- Online data available from the National Biodiversity Data Centre mapping service (http://maps.biodiversityireland.ie/#/Map);
- Information on water quality in the area available from www.epa.ie;
- Information on the Eastern River Basin District from www.wfdireland.ie;
- Information on soils, geology and hydrogeology in the area available from www.gsi.ie;
- Information on the location, nature and design of the proposed AAP supplied by the applicant's design team;
- *Status of EU Protected Habitats in Ireland.* (National Parks & Wildlife Service, 2013); and,
- *Birds of Conservation Concern in Ireland 2014-2019* (Colhoun *et al*, 2013)

Other Key Information Sources:

- *Wicklow County Development Plan 2010-2016;*
- *County Wicklow Biodiversity Action Plan 2010-2015;*
- *Enniskerry Local Area Plan 2013 – 2019; and,*
- *Eastern River Basin Management Plan 2009-2015*

Guidance which has been followed in determining magnitude and significance of impacts as well as in proposing mitigation measures include:

- *Guidelines for Ecological Impact Assessment in the United Kingdom* (Institute of Ecology and Environmental Assessment, 2006);
- *Guidelines on the Information to be Contained in Environmental Impact Statements* (Environmental Protection Agency, 2002);
- *Advice Notes on Current Practice (in the preparation of Environmental Impact Statements)* (EPA, 2003);
- *Environmental Construction Guidelines Series* (National Roads Authority 2005-2009);
- *Bat Mitigation Guidelines for Ireland* (National Parks and Wildlife Service, 2006); and,
- *Requirements for the Protection of Fisheries and Habitats during Construction and Development Works at River Sites* (The Eastern Regional Fisheries Board, now Inland Fisheries Ireland, 2005).

3 Stage One- Screening

3.1 Background

The above referenced guidance documents set out a staged process for carrying out Appropriate Assessment, the first stage of which is referred to as screening. This stage identifies the likely impacts on a European Site, if any, which would arise from a proposed plan or project either alone or in combination with other plans and projects, and further considers whether these impacts are likely to adversely affect the integrity of any European Sites.

If the conclusions at the end of the screening exercise are that significant impacts on any European Sites, as a result of the proposed plan, either alone or in combination with other plans and projects, are likely, uncertain or unknown, then there is a requirement to proceed to subsequent stages of Appropriate Assessment. The findings of the AA must be clearly documented in order to provide transparency of decision-making, and to ensure the application of the 'precautionary principle'.[2]

[2] One of the primary foundations of the precautionary principle, and globally accepted definitions, results from the work of the Rio Declaration. Principle #15 declaration notes:

Information for Appropriate Assessment was collected as part of the preparation of this Natura Impact Statement. While it was possible during this process to rule out the likelihood of significant impacts occurring on many of the European Sites, applying the precautionary principle, it was determined that due to a range of potentially significant impacts it was not possible to rule out significant impacts upon some European Sites in particular the Knocksink Wood cSAC. The assessment therefore proceeded to Stage Two: Appropriate Assessment.

The information within Section 3 below provides a summary of the information gathered for the screening exercise and Section 4 of this report takes forward the assessment on those European Sites which could not be screened out into Stage Two: Appropriate Assessment.

3.2 Overview of Proposed AAP and Receiving Environment

3.2.1 Brief Site Description

In order to fully understand the site, this report should be read in conjunction with three other site reports, namely:

- *Hydrogeological Characterisation Kilgarran, Enniskerry, County Wicklow.* Dr. Les Brown, 2014 (Refer to Appendix A);
- *Kilgarran Botanical Survey.* Dr. Joanne Denyer, 2014 (Refer to Appendix B); and,
- *Ecological Assessment of Lands at Kilgarran Hill, Enniskerry, Co.Wicklow.* Scott Cawley 2014. (Refer to Appendix B).

The proposed site is located on the L1011 road in Kilgarron, County Wicklow (O 21438 17466). It is designated by Wicklow County Council as the Action Area 1 (AA1) Zone. Following a number of site visits, in addition to a review of Ordnance Survey aerial photography of the site and locality, the site itself was found mainly to comprise of improved grassland.

Habitats within the AAP include oak-ash-hazel woodland, scrub, dry calcareous and neutral grassland showing signs of improvement, amenity grassland, and improved agricultural grassland. There is one derelict cottage on the site which is surrounded by scrub (with the potential to support roosting bats), and the majority of boundaries are comprised of hedgerows with some mature trees, some of which have the potential to support roosting bat species.

Notably, a calcareous spring (a Habitats Directive priority Annex I habitat) was noted within the AAP site in one of the fields (this is referred to as 'Spring 5' in the relevant Ecological and Hydrogeological reports). This spring is considered to be an example of the Annex I priority habitat 'Petrifying springs with tufa formation' (*Cratoneurion*). However, the tufa deposits are localised and species richness was low with few typical tufa species. It is therefore not considered to be a good example of a petrifying spring and is considered of county ecological importance only (as opposed to national or international). Also of note is the presence of a moss species at this spring which is a new Vice County record for County Wicklow (Denyer, 2014). However, this species is listed as 'Least Concern' on the Red List (Lockhart, et al. 2012).

Petrifying springs are also a priority feature for the designated site Knocksink Woods cSAC (code: 000725), as are the Alluvial forests with *Alnus glutinosa* and *Fraxinus excelsior* (*Alno-Padion, Alnion incanae, Salicion albae).* Although, the latter habitat lies outside of the AA1 zone extents and is buffered from the site by woodlands that are not qualifying features for this cSAC – the Alluvial Woodland is likely to be associated with tufa spring habitats (it is located to the north of Spring 7, closer to the Glencullen River).

"In order to protect the environment, the precautionary approach shall be widely applied by States according to their capabilities. Where there are threats of serious or irreversible damage, lack of full scientific certainty shall not be used as a reason for postponing cost-effective measures to prevent environmental degradation."

The location of the calcareous/petrifying springs, and those that are non-calcareous (and therefore do not qualify as the Annex Habitat) which might be impacted by this AAP are illustrated in Figure 1 below. This figure also shows the areas of highest sensitivity at this site.

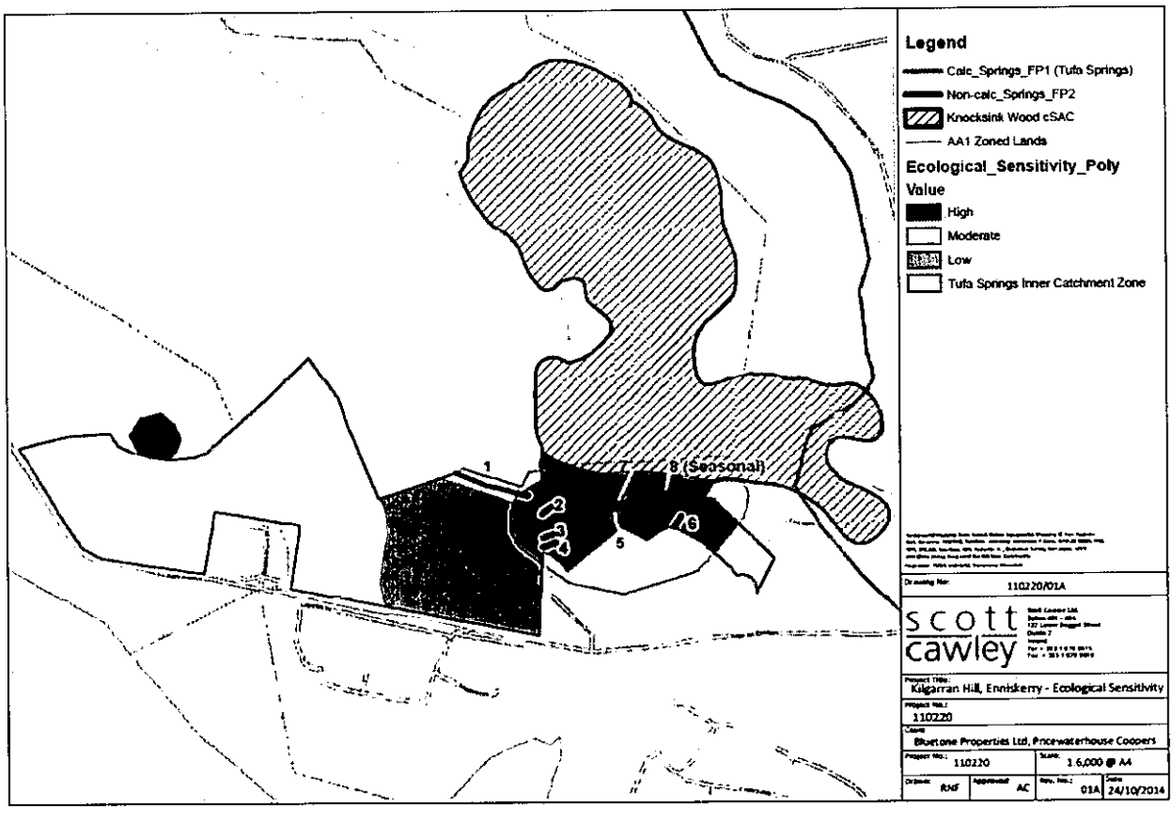

Figure 1: Ecologically Sensitive areas, Kilgarron Hill (Note: Annex I Petrifying Springs are shown in pale blue)

3.2.2 Features of the Site and Environs

The Kilgarron Hill site is located within a mainly agricultural setting with areas of improved grassland for grazing, in addition to some suburban environments to the south of the site. Knocksink Woods lies immediately to the north-east of the AA1 zone. There are a number of petrifying springs within the woodlands off site. The Glencullen River flows through the cSAC woodlands. Figure 2 below illustrates the petrifying spring with tufa formation that was located at 'Spring 7' within Knocksink Woodlands.



Figure 2: 'Petrifying springs with tufa formation' (*Cratoneurion*); Spring 7 within Knocksink Woods cSAC.

A Hydrogeological Characterisation was carried out for the AA1 site (Brown, 2014). This area lies uphill of the Glencullen River, at its confluence with the Dargle River, before flowing through Enniskerry. According to this report, the site surface water is almost entirely restricted to springs and seepages that infiltrate back to ground, or the tufa springs that emerge from the steep sided banks of the Glencullen River. The site is considered to have high recharge acceptance owing to significant permeability and that surface run-off will only be associated either temporally due to very intense rainfall or spatially where there is steep topography.

The bedrock, subsoil and soil of this site comprises of hard indurated phyllite overlain by a blanket of clay dominated till (with subsoils also derived from limestone glacial till materials making it highly calcareous where this occurs) this is then overlain by sand and gravels, and with a sandy dominated soil (Brown, 2014).

According to the Hydrogeological Characterisation report, the bedrock below the site is considered to only have local potential importance (LI) and are not considered to be significant as an aquifer. The groundwater system is anticipated to be confined within the bedrock material, and groundwater in the sands and gravels being free draining – reducing the site's potential as an aquifer to having local importance only. In addition, the potential aquifer at this site forms a tiered system.

The potential groundwater sources were assessed within the Hydrogeological Characterisation study. This assessment came to the conclusion that the ground water source for the tufa springs at this site must be attributed to flow within the sands and gravels, and the underlying confined bedrock is discounted as a potential source. The hydrogeological assessment outlines how such groundwater sources generally follow the topography within the shallow layer of sands and gravels (underlain by clay). However, where sudden changes in topography arise within the land, this can lead to the water table coming close to the surface. This occurs at the Kilgarron site and can be seen in the form of springs at this site, some of which are calcareous. The springs on this site have been numbered 1-6, with the petrifying springs located within the cSAC, numbered 7 and 8. Following consideration of all of the potential impacts of the AAP upon European Sites, the latter qualifying features within Knocksink Wood cSAC are the main concern within this NIR.

3.2.3 Description of the Proposed AAP

The following information is provided in more detail within the Action Area Plan for Enniskerry (Draft plan 5) and has been summarised below.

The Action Area 1 zone aims to provide residential developments, open space, community and employment opportunities for the locality. The objectives for zoning within the AA1 zone were set out within the Enniskerry Local Area Plan 2009 – 2016 (Wicklow County Council 2009) and have been incorporated within the Draft Action Area Plan (PricewaterHouseCoopers December 2014). The strategy for zoning within the AA1 area aims to meet these objectives. The LAP requires that this area shall be developed for a mix of uses including residential, employment, education, community, parking and active open space. The Land Use Plan can be seen in Figure 3.

The site strategy provides for 20 acres (8.2 ha) of land for residential development. A potential 210 residential units could be accommodated on site. Consideration has been given to the site specific characteristics and environmental constraints when planning housing densities and locations. In addition 1 ha is reserved for employment type uses including 0.4 ha for local service and new start-up businesses, which shall include spaces for visitor parking. 1.2 ha is reserved for educational uses should there be a requirement for additional educational facilities in the future, and 0.4 ha is reserved for community uses (this provides for a new community centre and playground facility). Access to the lands will primarily be provided via the existing L1011 road. Additional cycle facilities will be provided around the Village Green, the Employment Areas and the Community Area.

In light of the proximity of the AA1 lands to the existing Knocksink Wood cSAC (site code: 000725) and in particular its potential to impact upon two calcareous springs located within it (Springs 7 and 8), the lands zoned for development have avoided, for the large part, areas lying immediately adjacent to the cSAC boundary. These have been reserved as "green and active open space". In particular the buffer area closest to the cSAC boundary has been attributed as "green space" where it is envisaged that no development will occur. Any soft landscaping here is to be subject to appropriate ecological mitigation measures sensitive to the adjacent cSAC location (as outlined in Scott Cawley 2014).

Regard has also been given to the need to protect key views from the existing residences in the area. Furthermore, mature trees and hedgerows are to be retained and consideration has been given to the unique topography of the subject lands within this AAP.

At this early stage, the main infrastructure, roads and services (including associated drainage excavations) necessary for the overall development have not yet been finalised but are briefly discussed within the AAP report and this is relayed below in Section 3.2.4.

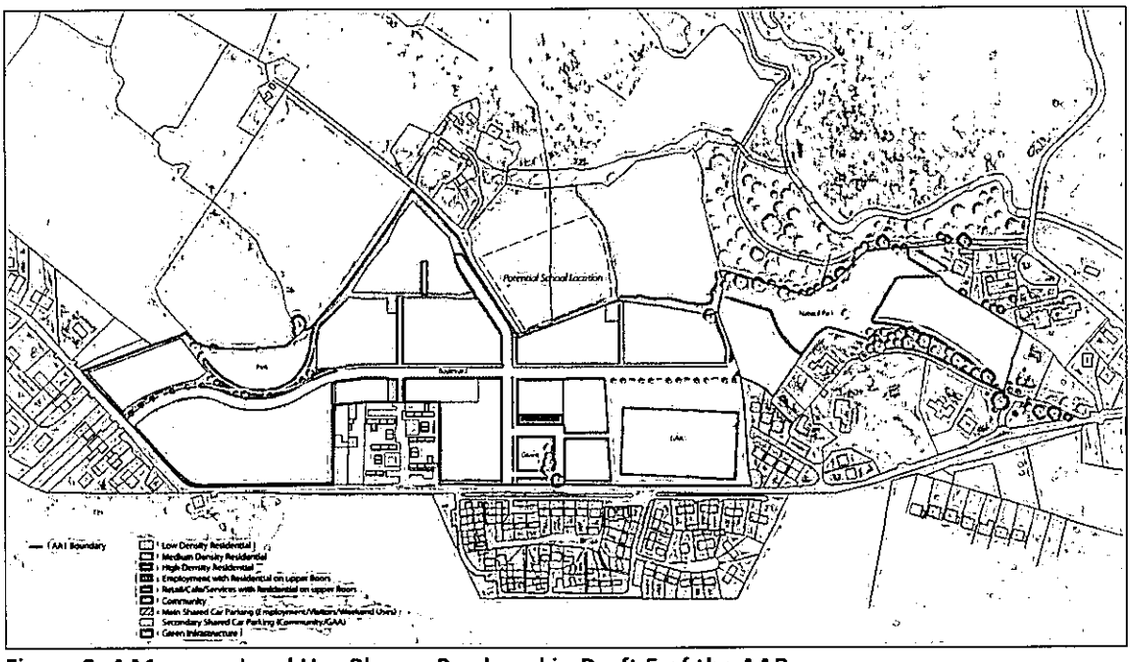

Figure 3: AA1 zone - Land Use Plan as Produced in Draft 5 of the AAP

3.2.4 Preliminary Description of Waste Water Treatment within AA1

Preliminary information regarding the treatment of waste water within the AA1 zone has been provided within the AAP report (Draft 5, December 2014) and from consultation with the consultant engineer from Waterman Moylan. Foul drainage from the AA1 zone will be collected through a system of underground sewers in the usual way and discharged to the public sewer on R117 Monastery Road adjacent to the Parochial House for treatment in the Enniskerry Wastewater Treatment Plant. The sewer on Monastery Road, which may need to be upsized from 150 mm diameter to 225 mm diameter, will be the main foul water outlet for this site. No on-site treatment of foul water is proposed for Action Area 1.

Enniskerry is currently serviced by the Enniskerry Waste Water Treatment Plant which is located at Cookstown on the Bray Road. It has a capacity for 6,000 p.e. (population equivalent) and it is currently operating well within its capacity with an annual load of c. 3,800 p.e (2012). This plant mainly services the village of Enniskerry with a certain capacity reserved for sludge management from the surrounding area. The current population in Enniskerry is estimated to be 2,200 persons with a projected increase to 2,500 persons in 2016 and 3,000 persons in 2022. Accordingly, the existing waste water plant will be adequate beyond 2022.

Action Area 1 will be required to provide a Sustainable Urban Drainage System (SuDS) to manage the surface water runoff and groundwater regimes on site. It will be a requirement that the proposed hard surfaces of Action Area 1 shall be drained through a SuDs system and the system will be based on a target of no additional drainage over the existing baseload. This will require a separate surface water network, attenuation where appropriate, and measures to ensure that no contamination enters the system.

Surface water drainage from the impermeable areas of Action Area 1 (roofs, roads, paths, car parking etc.) will be collected through a system of underground sewers in the usual way and discharged to an on-site attenuation and groundwater recharge area located in the eastern park.

The attenuation and recharge area will incorporate permeable over-ground features such as infiltration trenches located at an elevation higher than 87 metres OD (which is the location of these tufa springs).

Other features in the recharge area, which would be subject to detailed design at the planning application stage, could include grassy swales, filter channels, filter drains and soakaways.

Consultation was undertaken with the design engineer and the hydrogeological consultant in relation to the potential impacts of building within the 'inner catchment' zone for the tufa Springs within the cSAC. This is discussed in detail within Section 3.2.6.

There are a number of existing septic tanks on the lands within the AAP area. With the agreement of the owners, the houses served by these tanks will be connected to the new sewers and the septic tanks will be decommissioned as part of this Action Area Plan.

3.2.5 Designated sites in the surrounding area

Designated sites within 1km, 5km and 15km of the proposed development site are shown in Figure 4 below.

There are 10 candidate Special Areas of Conservation (cSAC) and four Special Protection Area's (SPAs) located within 15km of the AA1 Zone. Table 1 below outlines the qualifying features for these sites and highlights their conservation objectives, with conditions required to ensure their favourable status and potential threats to the qualifying interests or its required conditions. This is vital to identify any potential impact from the proposed development, or cumulatively with other developments, that may result in adverse effects on the qualifying interests of this cSAC. Table 2 outlines the detailed conservation objectives for Knocksink Wood cSAC which has a direct source-pathway-receptor link through the hydrology of this site.

Figure 4: All Nature 2000 Sites within 15km of the site

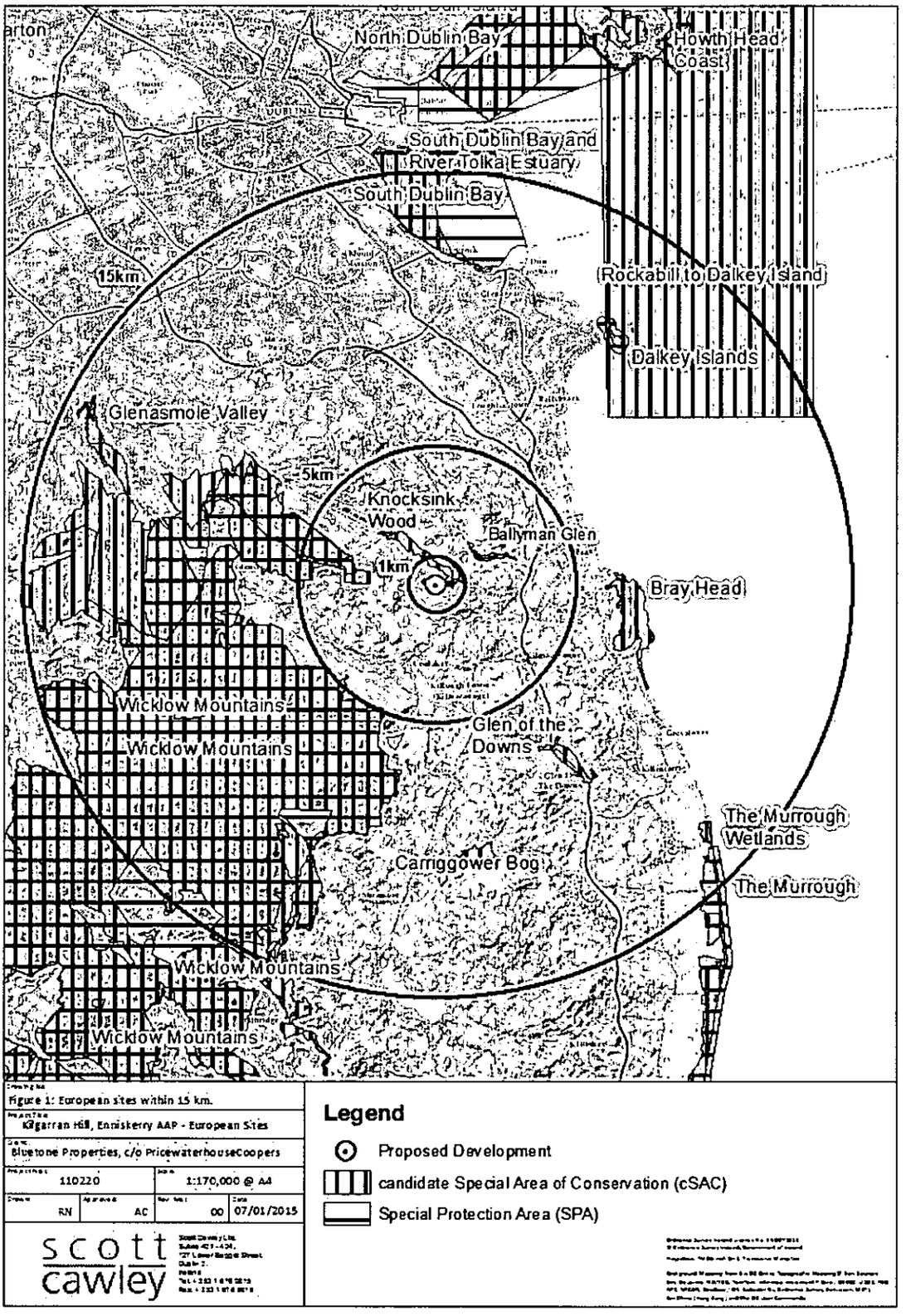

Table 1 Qualifying Interests, Conservation Status, Management Objectives, Conditions underpinning site integrity for relevant European sites

Site Name & Code	Approximate distance from Site	Qualifying Interests (*Priority Annex I Habitat for Conservation)	Current Conservation Status[3]	Conservation Management Objectives	Conditions underpinning site integrity	Potential Source-Pathway-Receptor Links?
Candidate Special Areas of Conservation						
Rockabill to Dalkey Island cSAC (003000)	*c.*8,300m	Annex I habitats: • [1170] Reefs Annex II species: • [1351] Harbour porpoise *Phocoena phocaena*	• Reefs – Bad (Declining) • Harbour porpoise – Favourable	• To maintain the favourable conservation condition of Reefs in Rockabill to Dalkey Island SAC; • To maintain the favourable conservation condition of harbour porpoise in Rockabill to Dalkey Island SAC.[4]	• Tidal currents • Water levels • Erosion and deposition rates • Water quality • Foraging Habitat • Food supply • Appropriate levels of disturbance • Air quality	No – there are no direct or indirect links likely to result in significant effects on the cSAC.
South Dublin Bay cSAC (000210)	*c.*11,300m	Annex I habitats: • [1140] Mudflats and sandflats not covered by seawater at low tide	• Mudflats and sandflats not covered by seawater at low tide – Inadequate (Improving)	To maintain or restore the favourable conservation condition of the Annex I habitat(s) and/or the Annex II species for which the SAC has been selected: • Mudflats and sandflats not covered by seawater at low tide [1140][5]	• Water quality including nutrient levels, water clarity, sediment levels • Erosion and deposition rates • Controlling bait digging	No – there are no direct or indirect links likely to result in significant effects on the cSAC.

[3] Sourced from Status of *EU Protected Habitats and Species in Ireland* (NPWS, 2013a & 2013b) for cSACs, and from *Birds of Conservation Concern in Ireland 2014-2019* (Colhoun & Cummins, 2014) for SPAs.

[4] Sourced from Site Conservation Objectives (http://www.npws.ie/publications/archive/003000_Rockabill%20to%20Dalkey%20Island%20SAC%20Marine%20Supporting%20Doc_V1.pdf accessed 24/03/14) – Detailed conservation objectives (attributes and targets) can be seen here.

[5] Sourced from South Dublin Bay cSAC Conservation Objectives (http://www.npws.ie/publications/archive/000210_South%20Dublin%20Bay%20SAC%20Marine%20Supporting%20Doc_V1.pdf accessed 23/12/14) – Detailed conservation objectives (attributes and targets) can be seen here.

Table 1 Qualifying Interests, Conservation Status, Management Objectives, Conditions underpinning site integrity for relevant European sites

Site Name & Code	Approximate distance from Site	Qualifying Interests (*Priority Annex I Habitat for Conservation)	Current Conservation Status[3]	Conservation Management Objectives	Conditions underpinning site integrity	Potential Source-Pathway-Receptor Links?
					• Land reclamation for industrial / infrastructure usage • Maintaining appropriate levels of disturbance • Tidal currents	
Wicklow Mountains SAC (002122)	c.1,950m	Annex II Species: • [1355] *Lutra lutra* Annex I Habitats: • [3130] Oligotrophic to mesotrophic standing waters (Soft Water Lakes) with vegetation of the *Littorelletea uniflorae* and/or of the *Isoëto-Nanojuncetea* • [3160] Natural dystrophic lakes and ponds • [4010] Northern Atlantic wet heaths with *Erica tetralix* • [4030] European dry heaths • [4060] Alpine and Boreal heaths • [6230]* Species-rich *Nardus* grasslands, on	• Otter – Favourable • Soft Water Lakes – Inadequate (Stable) • Dystrophic Lakes – Inadequate (Declining) • Wet Heath – Bad (Stable) • Dry Heaths – Bad (Stable) • Alpine and subalpine heath – Bad (Improving) • Species-rich *nardus* upland grassland* – Bad (Declining) • Blanket bogs – Bad (Declining) • Siliceous scree – inadequate (Improving)	• To maintain and where possible enhance the ecological value of all natural and semi-natural habitats and geological features within Wicklow Mountains National Park (WMNP) – blanket bog, heath, lakes and rivers, woodlands, exposed rock, grasslands and scrub. • To maintain and where possible increase the populations of rare and protected plant and animal species including Lanceolate Spleenwort, Parsley Fern, Small White Orchid, Bog Orchid, Peregrine Falcon, Merlin and Otter. • To establish and continue effective liaison with all interested parties in order to effectively manage WMNP. To	• Grazing of bog, heath, rocky habitats and woodland • Peat extraction and burning • Spread of non-native species • Disturbance to Habitats and Species • Peat erosion (e.g. through grazing and hill walking disturbance)	No – the site is downstream of the SAC and there are no direct or indirect links likely to result in significant effects on the cSAC.

Table 1 : Qualifying Interests, Conservation Status, Management Objectives, Conditions underpinning site integrity for relevant European sites

Site Name & Code	Approximate distance from Site	Qualifying Interests (*Priority Annex I Habitat for Conservation)	Current Conservation Status[3]	Conservation Management Objectives	Conditions underpinning site integrity	Potential Source-Pathway-Receptor Links?
		siliceous substrates in mountain areas (and submountain areas, in Continental Europe) • [7130] Blanket bogs (* if active only) • [8110] Siliceous scree of the montane to snow levels (*Androsacetalia alpinae and Galeopsietalia ladani*) • [8210] Calcareous rocky slopes with chasmophytic vegetation • [8220] Siliceous rocky slopes with chasmophytic vegetation • [91A0] Old sessile oak woods with Ilex and Blechnum in the British Isles	• Calcareous Rocky Slopes – Inadequate (Stable) • Siliceous Rocky Slopes – Inadequate (Stable) • Old oak woodlands – Bad (Improving)	encourage sustainable recreational and educational use of WMNP, to provide information and facilities for visitors and to improve public awareness of the natural heritage of the area, taking into account the social and economic needs of the communities in the area. • To maintain cultural features within WMNP, particularly those associated with the monastic settlement at Glendalough. • To maintain landscape, aesthetic and other qualities in the environs of WMNP, through liaison with neighbouring landowners and others concerned. • To undertake or facilitate research necessary to achieve the conservation objectives. • To purchase, if desirable, lands and rights, in areas adjacent to WMNP, should they become available, by mutual agreement,		

Table 1 Qualifying Interests, Conservation Status, Management Objectives, Conditions underpinning site integrity for relevant European sites

Site Name & Code	Approximate distance from Site	Qualifying Interests (*Priority Annex I Habitat for Conservation)	Current Conservation Status[3]	Conservation Management Objectives	Conditions underpinning site integrity	Potential Source-Pathway-Receptor Links?
				in order to consolidate existing WMNP lands.[6]		
Knocksink Wood cSAC (000725)	Immediately adjacent to AA1 zone	Annex I habitats: • [7220] Petrifying Springs* • [91E0] Alluvial Forests*	• Petrifying Springs – Inadequate (Stable) • Alluvial Forests – Bad (Improving)	To maintain or restore the favourable conservation condition of the Annex I habitat(s) and /or the Annex II species for which the SAC has been selected: • *Petrifying springs with tufa formation (*Cratoneurion*) [7220] • Alluvial forests with *Alnus glutinosa* and *Fraxinus excelsior* (*Alno-Padion, Alnion incanae, Salicion albae*) [91E0][7]	• Recreational Activities • Land reclamation for industrial / infrastructure usage • Water quality including nutrient levels, water clarity, sediment levels • Maintaining appropriate levels of disturbance	Yes – there are potentially significant links to this cSAC, and the proposed plan may have significant impacts – proceed to Stage Two: Appropriate Assessment.
Bray Head cSAC (000714)	c.5,400m	Annex I Habitats: • [1230] Vegetated sea cliffs of the Atlantic and Baltic coasts • [4030] European dry heaths	• Sea cliffs – Inadequate (Stable) • Dry heaths – Bad (Stable)	• To maintain the Annex I habitats for which the cSAC has been selected at favourable conservation status; European dry heaths (54% area of the site) and Vegetated sea cliffs of the Atlantic and Baltic coasts (6% area of the site) • To maintain the extent,	• Reclamation of grassland & Heathland Habitats • Burning of the Heath • Recreational Activities	No – there are no direct or indirect links likely to result in significant effects on the cSAC.

[6] Wicklow Mountains National Park (WMNP) Management Plan for 2005 - 2009 (www.npws.ie accessed 23/12/14)

[7] Detailed Conservation Objectives are not yet available for this site as such Table 2 illustrates the detailed conservation objectives for similar habitats that have been written for other cSAC sites, e.g. River Barrow and River Nore SAC (site code 2162) Conservation objectives supporting document woodland habitats.

Table 1 Qualifying Interests, Conservation Status, Management Objectives, Conditions underpinning site integrity for relevant European sites

Site Name & Code	Approximate distance from Site	Qualifying Interests (*Priority Annex I Habitat for Conservation)	Current Conservation Status[3]	Conservation Management Objectives	Conditions underpinning site integrity	Potential Source-Pathway-Receptor Links?
				biodiversity and species richness of the site; • To establish effective liaison and co-operation with landowners, legal users and relevant authorities[8]		
Ballyman Glen cSAC (000713)	c.1,300m	Annex I Habitats: • [7220] * Petrifying springs with tufa formation (*Cratoneurion*) • [7230] Alkaline fens	• Petrifying Springs – Inadequate (Stable) • Alkaline fens – Bad (Unknown)	To maintain or restore the favourable conservation condition of the Annex I habitat(s) and /or the Annex II species for which the SAC has been selected: • *Petrifying springs with tufa formation (*Cratoneurion*) [7220] • Alkaline fens [7230] Other conservation objectives for similar sites include[9]: • To maintain the extent, species richness and diversity of the entire site • To establish effective liaison and co-operation with landowners, legal users and relevant authorities	• Over Extraction of water from spring • Agricultural Run-Off	No – there are no direct or indirect links likely to result in significant effects on the cSAC. This site is buffered from the proposed plan (AA1 zone) by the Knocksink Woods and the Glencullen River.

[8] Detailed conservation objectives are obtained here: http://www.npws.ie/media/npwsie/content/images/protectedsites/conservationstatement/CS000714.pdf

[9] Detailed conservation objectives for Petrifying Springs can be seen in Table 2 and more detailed conservation objectives for Alkaline Fen can be sourced from: Huggingstown Fen cSAC Conservation Statement at http://www.npws.ie/media/npwsie/content/images/protectedsites/conservationstatement/CS000404.pdf

Table 1 Qualifying Interests, Conservation Status, Management Objectives, Conditions underpinning site integrity for relevant European sites

Site Name & Code	Approximate distance from Site	Qualifying Interests (*Priority Annex I Habitat for Conservation)	Current Conservation Status[3]	Conservation Management Objectives	Conditions underpinning site integrity	Potential Source-Pathway-Receptor Links?
Carrigower Bog cSAC (000716)	*c.*9,300m	Annex I Habitats: • [7140] Transition mires and quaking bogs	• Transition mires – Bad (Unknown)	• To maintain the Annex I habitat for which the cSAC has been selected at favourable conservation status; Transition mires and quaking bogs (22% area of the site). • To maintain the extent, species richness and biodiversity of the entire site. • To establish effective liaison and co-operation with landowners, legal users and relevant authorities.[10]	• Land drainage • Grazing levels • Agricultural intensification • Forestry	No – there are no direct or indirect links likely to result in significant effects on the cSAC.
Glenasmole Valley cSAC (001209)	*c.*11,200m	Annex I Habitats: • [6210] Semi-natural dry grasslands and scrubland facies on calcareous substrates (*Festuco Brometalia*) (*important orchid sites) • [6410] *Molinia* meadows on calcareous, peaty or clayey-silt-laden soils (*Molinion caeruleae*)	• Orchid-rich calcareous grassland – Bad (Stable) • Molina meadows – Bad (Declining) • Petrifying Springs – Inadequate (Stable)	To maintain the Annex I habitats for which the cSAC has been selected at favourable conservation status; • Petrifying springs with tufa formation (*Cratoneurion*) (<1% area of the site), Semi-natural dry grassland and scrubland facies on calcareous substrates (*Festuco Brometalia*) (20% area of the site) and Molinia meadows on calcareous, peaty or clayey-silt-aden soils (*Molinion*	• Modern Agricultural Intensification	No – The proposed plan lies downstream of this site. There are no direct or indirect links likely to result in significant effects on the cSAC.

[10] More detail on Conservation Objectives for this site can be found within the Conservation Statement here: http://www.npws.ie/media/npwsie/content/images/protectedsites/conservationstatement/CS000716.pdf

Table 1 Qualifying Interests, Conservation Status, Management Objectives, Conditions underpinning site integrity for relevant European sites

Site Name & Code	Approximate distance from Site	Qualifying Interests (*Priority Annex I Habitat for Conservation)	Current Conservation Status[3]	Conservation Management Objectives	Conditions underpinning site integrity	Potential Source-Pathway-Receptor Links?
		• [7220] * Petrifying springs with tufa formation (*Cratoneurion*)		*caeruleae*) (2% area of the site) • To maintain the extent, species richness and biodiversity of the entire site • To establish effective liaison and co-operation with landowners, legal users and relevant authorities.[11]		
Glen of the Downs cSAC (000719)	c.6,750m	Annex I Habitats: • [91A0] Old sessile oak woods with Ilex and *Blechnum* in the British Isles	• Old oak woodlands – Bad (Improving)	To maintain or restore the favourable conservation condition of the Annex I habitat(s) and /or the Annex II species for which the SAC has been selected: • *Old sessile oak woods with Ilex and *Blechnum* in the British Isles [91A0][12]	• Land Take & Habitat Reduction	No – there are no direct or indirect links likely to result in significant effects on the cSAC.

[11] Sourced from Glenasmole Valley Conservation Statement: http://www.npws.ie/media/npwsie/content/images/protectedsites/conservationstatement/CS001209.pdf

[12] There are no detailed Conservation Objectives for Glen of the Downs cSAC. Detailed Conservation Objectives for Old Oak Woodlands can be seen in the Slaney River Valley cSAC Conservation Objectives found at http://www.npws.ie/media/npwsie/content/images/protectedsites/conservationobjectives/CO000781.pdf

Table 1 Qualifying Interests, Conservation Status, Management Objectives, Conditions underpinning site integrity for relevant European sites

Site Name & Code	Approximate distance from Site	Qualifying Interests (*Priority Annex I Habitat for Conservation)	Current Conservation Status[3]	Conservation Management Objectives	Conditions underpinning site integrity	Potential Source-Pathway-Receptor Links?
The Murrough Wetlands cSAC (002249)	c.12,600m	Annex I Habitats: • [1210] Annual vegetation of drift lines • [1220] Perennial vegetation of stony banks • [1330] Atlantic salt meadows (*Glauco-Puccinellietalia maritimae*) • [1410] Mediterranean salt meadows (*Juncetalia maritimi*) • [7210] * Calcareous fens with *Cladium mariscus* and species of the *Caricion davallianae* • [7230] Alkaline fens	• Drift lines – Inadequate (Declining) • Perennial vegetation of stony banks – Inadequate (Stable) • Atlantic salt meadows – Inadequate (Stable) • Mediterranean salt meadows – Inadequate (Stable) • *Cladium* Fen – Bad (Unknown)	Objective: To maintain or restore the favourable conservation condition of the Annex I habitat(s) and/or the Annex II species for which the SAC has been selected: • [1210] Annual vegetation of drift lines • [1220] Perennial vegetation of stony banks • [1330] Atlantic salt meadows (*Glauco-Puccinellietalia maritimae*) • [1410] Mediterranean salt meadows (*Juncetalia maritimi*) • [7210] * Calcareous fens with *Cladium mariscus* and species of the *Caricion davallianae*[13]	• Land drainage • Land use (e.g. building of an embankment and levelling of sandhills) • Land reclamation • Afforestation • Water quality • Agricultural intensification • Disturbance	No – there are no direct or indirect links likely to result in significant effects on the cSAC.
Special Protection Areas						
Dalkey Islands SPA	c.10,200m	• Roseate Tern (*Sterna dougallii*) [A192]	• [A192] – Amber • [A193] – Amber	To maintain or restore the favourable conservation condition	• Water quality including nutrient	No – there are no direct or indirect

[13] There are no detailed Conservation Objectives currently available for The Murrough Wetlands cSAC, however, more detail on Conservation Objectives for a similar site can be seen for the Slyne Head Peninsula cSAC at http://www.npws.ie/media/npwsie/content/images/protectedsites/conservationstatement/CS002074.pdf detailed conservation objectives for Calcareous Fen habitat [7210] can be sourced from http://www.npws.ie/media/npwsie/content/images/protectedsites/conservationobjectives/CO000268_V1.pdf (Galway Bay Complex SAC 000268)

Table 1 Qualifying Interests, Conservation Status, Management Objectives, Conditions underpinning site integrity for relevant European sites

Site Name & Code	Approximate distance from Site	Qualifying Interests (*Priority Annex I Habitat for Conservation)	Current Conservation Status[3]	Conservation Management Objectives	Conditions underpinning site integrity	Potential Source-Pathway-Receptor Links?
(004172)		• Common Tern (*Sterna hirundo*) [A193] • Arctic Tern (*Sterna paradisaea*) [A194]	• [A194] – Amber	of the bird species listed as Special Conservation Interests for this SPA: • The qualifying interests of the European site as listed in columns to the left	levels, water clarity, sediment levels • Foraging Habitat • Food supply • Appropriate Levels of disturbance • Water levels • Tidal currents • Erosion / deposition levels • Freshwater influx • Intertidal habitats • Air Quality	links likely to result in significant effects on the SPA.
South Dublin Bay and River Tolka Estuary SPA (004024)	*c.*11,300m	• Light-bellied Brent Goose (*Branta bernicla hrota*) [A046] • Oystercatcher (*Haematopus ostralegus*) [A130] • Ringed Plover (*Charadrius hiaticula*) [A137] • Grey Plover (*Pluvialis squatarola*) [A140] • Knot (*Calidris canutus*) [A143] • Sanderling (*Calidris alba*) [A144] • Dunlin (*Calidris alpina*)	• [A046] – Amber • [A130] – Amber • [A137] – Green • [A140] – Amber • [A143] – Red • [A144] – Green • [A149] – Red • [A157] – Amber • [A162] – Red • [A179] - Red • [A192] – Amber • [A193] – Amber • [A194] – Amber	To maintain or restore the favourable conservation condition of the bird species listed as Special Conservation Interests for this SPA: • The qualifying interests of the European site as listed in columns to the left	• Water quality including nutrient levels, water clarity, sediment levels • Foraging Habitat • Food supply • Appropriate Levels of disturbance • Water levels • Tidal currents • Erosion / deposition levels • Freshwater influx • Intertidal habitats • Air Quality	No – there are no direct or indirect links likely to result in significant effects on the SPA.

Table 1 Qualifying Interests, Conservation Status, Management Objectives, Conditions underpinning site integrity for relevant European sites

Site Name & Code	Approximate distance from Site	Qualifying Interests (*Priority Annex I Habitat for Conservation)	Current Conservation Status[3]	Conservation Management Objectives	Conditions underpinning site integrity	Potential Source-Pathway-Receptor Links?
		[A149] • Bar-tailed Godwit (*Limosa lapponica*) [A157] • Redshank (*Tringa totanus*) [A162] • Black-headed Gull (*Larus ridibundus*) [A179] • Roseate Tern (*Sterna dougallii*) [A192] • Common Tern (*Sterna hirundo*) [A193] • Arctic Tern (*Sterna paradisaea*) [A194] • Wetlands & Waterbirds [A999]				
Wicklow Mountains SPA (004040)	*c.*2,500m	• Merlin (*Falco columbarius*) [A098] • Peregrine (*Falco peregrinus*) [A103]	• [A098] – Amber • [A103] – Green	To maintain or restore the favourable conservation condition of the bird species listed as Special Conservation Interests for this SPA: • The qualifying interests of the European site as listed in columns to the left	• Appropriate levels of afforestation • Water quality • Foraging habitat • Breeding habitat • Food supply • Appropriate Levels of disturbance • Air Quality	No – The site lies downstream of the Wicklow Mountains. There are no direct or indirect links likely to result in significant effects on the SPA.
The Murrough SPA (004186)	*c.*13,450m	• Red-throated Diver (*Gavia stellata*) [A001] • Greylag Goose (*Anser anser*) [A043]	• [A001] – Amber • [A043] – Amber • [A046] – Amber • [A050] – Red	To maintain or restore the favourable conservation condition of the bird species (and wetland habitats associated with them)	• Increased development in surrounding area • Increases in	No – there are no direct or indirect links likely to result in

Table 1 Qualifying Interests, Conservation Status, Management Objectives, Conditions underpinning site integrity for relevant European sites						
Site Name & Code	**Approximate distance from Site**	**Qualifying Interests** (*Priority Annex I Habitat for Conservation)	**Current Conservation Status**[3]	**Conservation Management Objectives**	**Conditions underpinning site integrity**	**Potential Source-Pathway-Receptor Links?**
		• Light-bellied Brent Goose (*Branta bernicla hrota*) [A046] • Wigeon (*Anas penelope*) [A050] • Teal (*Anas crecca*) [A052] • Black-headed Gull (*Chroicocephalus ridibundus*) [A179] • Herring Gull (*Larus argentatus*) [A184] • Little Tern (*Sterna albifrons*) [A195] • Wetlands & Waterbirds [A999]	• [A052] – Amber • [A179] – Red • [A184] – Red • [A195] – Amber	listed as Special Conservation Interests for this SPA: • The qualifying interests of the European site as listed in columns to the left	disturbance • Water quality • Agricultural intensification (and impacts upon water quality)	significant effects on the SPA.

Table 2: Knocksink Wood cSAC Detailed Conservation Objectives		
Attribute	**Measure**	**Target**
*** Petrifying springs with tufa formation (*Cratoneurion*) [7220]**		
To maintain the favourable conservation condition of Petrifying springs with tufa formation *(Cratoneurion)*[14] which might be defined by the following list of attributes and targets:		
Habitat area	Square Meters	The permanent area is stable or increasing, subject to natural processes.
Habitat distribution	Occurrence	No decline.
Hydrological regime: height of water table; water flow	Meters; Meters per second	Maintain appropriate hydrological regimes.
Water quality	Water chemistry measures	Maintain oligotrophic and calcareous conditions.
Vegetation composition: Typical species	Occurrence	Maintain typical species.
*** Alluvial forests with *Alnus glutinosa* and *Fraxinus excelsior* (*Alno-Padion, Alnion incanae, Salicion albae*) [91E0]**		
To restore the favourable conservation condition of Alluvial forests with *Alnus glutinosa* and *Fraxinus excelsior* (Alno-Padion, Alnion incanae, Salicion albae)[15] which might be defined by the following list of attributes and targets:		
Habitat Area	Hectares	Area stable or increasing, subject to natural processes.
Habitat Distribution	Occurrence	No decline.
Woodland Size	Hectares	Area stable or increasing.
Woodland Structure: Cover and Height	Percentage and Meters	Diverse structure with a relatively closed canopy containing mature trees; sub-canopy layer with semi-mature trees and shrubs; and well-developed herb layer.
Woodland structure: community diversity and extent	Hectares	Maintain diversity and extent of community types.
Woodland structure: Natural regeneration	Seedling: sapling: pole ratio	Seedlings, saplings and pole age-classes occur in adequate proportions to ensure survival of woodland canopy.
Hydrological regime: flooding depth/height of water	Meters	Appropriate hydrological regime necessary for maintenance of alluvial vegetation.

[14] There are no detailed conservation objectives currently written for Knocksink Wood cSAC, therefore the Conservation Objectives outlined for the Petrifying Springs [7220] of the River Barrow and River Nore SAC [002162] have been referred to in this report.

[15] Detailed Conservations Objectives are not available for Knocksink Wood cSAC therefore, the Conservation Objectives outlined for Alluvial Woodland of the Lower River Shannon SAC [002165] has been referred to in this report.

Woodland structure: dead wood	M^3 per hectare; number per hectare	Maintain an appropriate % of woodland as fallen timber greater than 10cm diameter in addition to an appropriate % of snags/ha (standing dead wood); both categories should include stems greater than 40cm diameter (greater than 20cm diameter in case of alder)
Woodland structure: Veteran trees	Number per hectare	No decline
Woodland structure: indicators of local distinctiveness	Occurrence	No decline
Vegetation composition: Native tree cover	Percentage	No decline. Native tree cover not less than 95%.
Vegetation composition: Typical species	Occurrence	A variety of typical native species present, depending on woodland type, such as alder *(Alnus glutinosa)*, ash *(Fraxinus excelsior)* and willows *(Salix spp)*.
Vegetation composition: Negative indicator species	Occurrence	Negative indicator species particularly non-native invasive species, absent or under control.

3.4 Identification of European Sites and their Relevance to the Proposed Development

European Sites are considered relevant where a source-pathway-receptor link exists between the proposed development and the European Site. In order for an impact to occur there must be a risk enabled by having a 'source' (e.g. construction works at a proposed development site), a 'receptor' (e.g. a SAC or other ecologically sensitive feature), and a pathway between the source and the receptor (i.e. a watercourse which connects the proposed development site to the SAC). The risk of the impact does not automatically mean it will occur, nor that it will be significant. However, identification of the risk does mean that there is a possibility of ecological or environmental damage occurring, with the level and significance of the impact depending upon the nature and exposure to the risk and the characteristics of the receptor.

Subsequent to detailed survey work and after carrying out a Hydrogeological Characterisation study (as discussed in the various sections above) at this site, the only European Site that is considered to be at risk from the Action Area 1 Plan is the Knocksink Wood cSAC due to the clear source-pathway-receptor links at this site i.e. the inner catchment zone for the petrifying springs lies largely within the eastern side of the AA1 zone.

3.5 Summary of Screening Conclusions

Due to their substantial distances from the site along with the absence of significant source-pathway-receptor links (such as watercourses or ground water linkages) and the fact that a number of the sites are upstream of this proposed plan and outside of its zone of influence, the possibility of impacts occurring on most European Sites within 15km has been ruled out.

However, it was determined that due to a range of potential risks, it was not possible to rule out significant impacts upon the Knocksink Woods cSAC. Therefore, for this European Site, the process needs to proceed to Stage Two: Appropriate Assessment as detailed in Section 4 below.

4 Stage Two: Provision of information for an Appropriate Assessment

Within this stage of the summary assessment, the potential impact of the proposed development on the integrity of the Knocksink Wood cSAC was examined with respect to the conservation objectives of the European Site and to its general structure and function.

The report also includes specific avoidance or mitigation measures to ensure that the proposal will have no adverse effect on the integrity of the European Sites. Finally, a conclusion of the assessment is provided in Section 5.

4.1 Knocksink cSAC

4.1.1 Conservation objectives

One of the overall aims of the Habitats Directive is to maintain or restore the favourable conservation status of habitats and species of community interest. Site specific conservation objectives aim to define favourable conservation condition for particular habitats or species within that site – but have not been drafted for this particular European site. Therefore in accordance with good practice, site-specific Conservation Objectives have been taken from other sites containing the same Qualifying interests. The conservation objectives for the qualifying interests of the Knocksink Wood cSAC include those are listed in Table 1 and Table 2 above in Section 3.2.5.

4.1.2 Knocksink Wood SAC (000725)

The reasons for designation include two Annex I habitats (i.e. Petrifying springs with tufa formation (*Cratoneurion*) [7220] and Alluvial forests with *Alnus glutinosa* and *Fraxinus excelsior* (*Alno-Padion, Alnion incanae, Salicion albae*) [91E0]). The cSAC is located immediately beside the proposed AAP site (see Figure 1) and part of the land ownership of the client lies directly within the cSAC (although this is outside of the AA1 Zone for this AAP). The proposed plan is connected hydrologically to the cSAC as the inner catchment zone for the petrifying springs within Knocksink Woodland (to the south of the woodland) lies within a large portion of the eastern extents of the AA1 zone.

Figure 1 illustrates the non-calcareous and the calcareous springs that exist within the AA1 zone. The 'Spring 5' is an example of a poor quality petrifying spring as the tufa deposits were localised, species richness was low with few typical tufa species (Denyer 2014). As this feature is an Annex I priority habitat, it is deemed to be of County Ecological Importance. Two other tufa springs were noted within the cSAC, 'Springs 7 & 8'. These are within the Zone of Influence of this AAP due to the inner catchment zone for these springs being located within the AA1 zone. Spring 8 was illustrated on the NPWS's draft 'Indicative Habitat Map' for Knocksink Wood cSAC, however, during the surveys this spring was not identified. It is deemed likely that this is a seasonal spring which was not visible during the site visits.

Spring 7 was considered to be a typical woodland example of a petrifying spring with tufa formation and is classified as an Annex I priority habitat. Figure 5 in below illustrates where this Annex I priority feature lies in relation the AA1 zone. The inner catchment for the tufa springs within the southern boundary of the cSAC can be clearly seen.



Figure 5: Estimation of the inner zone to the catchment of the tufa springs within Knocksink Wood cSAC (with upper and central zones annotated).

The main link that exists between the proposed development and conditions underpinning site integrity is the potential for impacts upon the inner catchment zone for the tufa springs during construction and operation of development with the AAP. This is discussed in detail within the Hydrogeological Characterisation report in Appendix A (Brown, 2014). These impacts are discussed further in Section 4.2.2 below.

4.1.3 Condition of site and management

According to Natura 2000 Standard Data Form, the Knocksink Wood cSAC is an important site due to the presence of rare habitats, both of which are priority Annex I qualifying features for this cSAC designation (i.e. the Petrifying springs with tufa formation (*Cratoneurion*) [7220] and Alluvial forests with *Alnus glutinosa* and *Fraxinus excelsior* (*Alno-Padion, Alnion incanae, Salicion albae*) [91E0]). There are a number of rare flora which are supported within this woodland such as Blue Fleabane (*Erigeron acer*), Ivy-leaved Bellflower (*Wahlenbergia hederacea*), Yellow Archangel (*Lamiastrum galeobdolon*) and Bird's Nest Orchid (*Neottia nidus-avis*).

Within the Natura 2000 the quality and importance of this site is referred to:
"A relatively small, but diverse wooded valley, notable for the occurrence of good examples of tufa-forming springs and associated alluvial forest. The site is also important for a number of rare plants, including Erigeron acer, Lamiastrum galeobdolon and Wahlenbergia hederacea, and a particularly diverse woodland invertebrate fauna. Its proximity to Dublin adds to its value as an educational and amenity resource."

The NPWS report *Status on EU Protected Species and Habitats* (2013) describes the conservation status of qualifying interests within the cSAC as 'Inadequate (Stable)' for petrifying springs. This status is due to

drainage land reclamation, unsuitable grazing levels, pollution and water abstraction as well as more isolated instances of road drainage and outdoor leisure pursuits.

The status for alluvial forests is 'Bad (Improving)'. Considerable amounts of this woodland have been lost over time and this habitat is highly fragmented. The main pressures impacting this habitat include non-native and invasive species (such as sycamore and beech) in addition to problematic native species (such as common nettle and bramble) due to under-grazing. There have been considerable efforts made to control these problematic species and to reinstate correct hydrological regimes and as such the status of this habitat has slightly improved since the 2007 assessment.

The Natura 2000 Standard Data Form also notes that both the Annex I habitat and Annex II species are particularly vulnerable to the effects of recreational activities; land reclamation for industrial / infrastructure usage; water quality including nutrient levels, water clarity, sediment levels and maintaining appropriate levels of disturbance.

The site is managed by NPWS, however, no management plan is currently available for this cSAC. The Knocksink Education Centre is currently closed.

4.1.4 Interest features potentially exposed to risk

The alluvial woodland at this site is likely to be fed by groundwater, but this habitat is likely to have a much lower sensitivity to changes in groundwater than the petrifying springs. The Groundwater levels are likely to be buffered and possibly impounded by the river i.e. low lying ground with seepages rather than springs in steeper elevation (Personal Communication Dr. Les Brown, 2014). The Glencullen River will not be impacted by this AAP and therefore the petrifying springs are considered to be the main interest feature which is exposed to risk by development within this AAP.

4.1.5 Catchment Zone for the Knocksink Woods Tufa Springs within the AAP

The cSAC tufa springs (as discussed in Section 3.2.2) are located in Knocksink Wood at an elevation of 87 metres OD. The primary catchment for these springs extends over an area of 5 ha, of which *c.*2.5 ha is located within the development site. The remaining *c.*2.5 ha are located outside the development site and will not be directly affected by the proposed development.

The hydrogeological Assessment has identified that this catchment area (for the tufa springs within Knocksink Wood cSAC) lies immediately south and south-west, up gradient, of where these springs come to the surface. This area is largely located between Knocksink Woods and Kilgarron House, on Kilgarron Hill. The catchment was refined further to exclude the northern part of the site that drains northwards towards an unnamed tributary to the Glencullen River upstream. Furthermore, the south-eastern corner of the site (next to St Mary's Church) was outside of the catchment at it lies oblique to the tufa springs (Brown, 2014).

Importantly, through the Hydrogeological Characterisation, it was noted that an inner zone forms the core of the catchment and encompasses the immediate area where an impact would modify the qualitative or quantitative conditions of the spring. It was also stated that although the zone of contribution may extend beyond the inner zone, the impact here would either be attenuated by recharge in the inner zone reducing the impact, or may even be outside of the catchment (Brown, 2014). Figure 5 above illustrates the upper, central and inner catchment zones of the tufa springs within the cSAC. Only the inner zone was assessed as being at risk from development within the AA1 zone. 'Spring 5', as shown on Figure 1, was noted to be part of the catchment to the tufa springs ('Springs 7 & 8') within the cSAC. Spring 8 was dry at the time of survey but was identified in previous NPWS mapping, and is likely to be a seasonal tufa spring. It was initially believed that another spring may exist at location

6 which might be causing an overflow from a septic tank in this location. Following the hydrogeological survey, it was later understood that the occasional wastewater overflow was, in fact, not spring related. According to the land owner, this septic tank has now been decommissioned and no longer poses a threat to the quality of the tufa springs within Knocksink cSAC (polluted runoff from the septic tank was noted to have ceased on the most recent site visit).

4.2 Potential risk to site resulting from Project

As discussed above, the proposed development is connected hydrologically to the Knocksink Wood cSAC, particularly through the inner catchment zone for petrifying springs. The associated tufa springs (Springs 5, 7 & 8) may be at risk of impacts upon water quality, quantity and habitat disturbance/destruction as a result of development construction and operation activities.

The hydrogeological characterisation report states that the risk to the cSAC petrifying springs from development with the Upper Zone (as illustrated on Figure 5) is low. This report also states that impacts are unlikely to occur upon the tufa springs from works within the central zone due to the significant separation distance. However, the ground immediately up gradient to the tufa springs forms their inner zone and is capable of providing the recharge and storage estimated for these springs. These tufa springs are considered to be at risk from activities outline below, where these occur within the inner zone:

- Abstraction by interception of groundwater is likely to reduce flow at the spring by the abstracted amount potentially rendering the spring dry or seasonal;
- Dilution or mixing of the groundwater, for example with storm discharges, will have a direct impact on the hydrochemistry of the spring and may lead to cessation of tufa precipitation.

According to the Hydrogeological Characterisation report *"There are other tufa springs within the cSAC (e.g. south of St Mary's church and further north of the development site on both banks of the Glencullen River). However, these other springs are outside of the zone of influence of the proposed development and therefore are not at risk."*

The specific recommendations within the Hydrogeological Characterisation report state that:

"Any works undertaken in the inner zone of the catchment should not abstract from or discharge to groundwater. Furthermore, ground works in this area should not divert, impede, dilute or reduce groundwater flow or quality. It is recommended that if ground works, abstractions or discharges are to be undertaken for construction or operation in the inner catchment zone that a site specific assessment should be conducted to assess potential impact to cSAC. These works are likely to include installation of shallow groundwater monitoring wells in order to determine baseline conditions (water level and water quality) to monitor during and after construction."

4.2.2 Potential impacts from the AAP upon the European Site

The hydrogeological assessment concluded that development within the AAP has the potential to result in direct impacts upon the Annex I habitats within the cSAC (i.e. Springs 7 and 8) if it occurs within the "inner catchment" zone. Activities that divert, impede, dilute or reduce the ground water flow or quality within the "inner zone" would impact negatively upon the tufa springs 7 & 8 with the cSAC (Brown, 2014). The potential "in-combination" effects are discussed further within Section 4.2.3.

The current AAP (Draft 5, December 2014) proposes to build 8 - 10 (No.) detached houses on individual sites on c. 2.5 ha of the "inner catchment" zone, located within the AA1 site. The design mitigation proposed for this development includes an open landscaped recharge area. Each of the sites would have an area of c.0.2 ha and the recharge area would have an area of c.0.5 ha. Having regard to the location

of the tufa springs, the recharge will be located in the northern section of the catchment area adjacent to the springs. Similarly, the houses, roads and services will be located to the southwest and south of the recharge area.

The development of land within the "inner catchment", in addition to the creation of the mitigation recharge area itself all have the potential to impact upon the tufa springs, as they would require activities such as those outlined above. Therefore, all such works must be subject to further detailed assessment and mitigation in order to negate the risks upon this European Site. This is discussed further in Section 4.3.

4.2.3 Potential 'in-combination' effects

There is the potential for other plans or development projects within the prescribed "inner zone" of catchment to result in impacts upon the tufa springs within Knocksink Wood cSAC (Spring 7 & 8).

Following a search conducted on the Wicklow County Council planning website it was noted that there are two currently proposed developments which occur within the estimated "inner zone" catchment (at the time of writing). The planning permission on these projects remains valid at this present time. These are listed below:

- A planning application (Ref: 138714; extension to 08/1366) for a single storey dwelling and basement (on an area formerly used as a tennis court) at 'Macha Na Mbó', Kilgarron, Enniskerry, Co. Wicklow (which expires on 16th July 2016). This site lies to the south of the inner zone, uphill of the tufa springs; and,
- A planning application (Ref: 114558) to convert the existing attic space into habitable accommodation (two double bedrooms and one bathroom) at Cois Coillte, Church Road, Enniskerry, Co. Wicklow (which expires on 31st October 2016). This site lies within the north east of the inner zone (closer to the location of the seasonal Spring 8).

There are a number of other recent developments (which have received planning permission within the last five years but which have now expired) that lie in very close proximity to the estimated "inner zone", upstream of the Tufa Springs on Kilgarron Hill. Some of these developments include excavation works for extensions to existing buildings and construction of basement levels which would require significant excavation works. However, as they are not believed to lie within the "inner zone" of catchment, they are unlikely to pose a threat to the qualifying features for this European Site.

Work activities such as ground works, land-take etc. (as outlined in Section 4.2 above) have the potential to result in negative impacts upon the local hydrogeology, as well as to the petrifying springs within the cSAC, where these impact on the "inner zone" and have not been appropriately mitigated for. Other impacts may include surface water pollution events or from pollution associated with waste water. In addition, if they were significant enough, such events could have a detrimental impact upon the quality of the Glencullen River which flows through the cSAC woodlands.

Following further ecological, botanical and hydrogeological assessments of this site, it is considered likely that, unmitigated, this AAP would have an impact on the cSAC where the works would impact upon the inner catchment zone of the tufa springs, namely Spring 7 & 8 within Knocksink Woods, as outlined in Section 3.2.6. There are no other known plans affecting the "inner catchment" zone, therefore the only "in-combination" effects that might arise are those from the two developments outlined above which lie within the "inner zone". As the second development (Ref: 114558) does not involve any of the activities outlined in Section 4.2, the only potential for "in-combination" effects is considered to be following the excavation of ground for a basement level within the development Ref: 138714; extension to 08/1366. This proposal is for an area of ground that is currently hard standing (formerly used as a tennis court).

On consultation of the planning documents provided for this application it was noted that the following decision was made:

The planning application decision for this project states that *"Having regard to the nature of the proposed development comprising an infill dwelling in a side garden, adjoining a residential cul de sac, the proposed servicing of the dwelling by public mains water and sewer and the site synopsis of the identified Natura 2000 site, it is considered that the proposed development would not give rise to any adverse impacts on the qualifying interests and the conservation objectives of the designated site and would therefore not necessitate the carrying out of an Appropriate Assessment in accordance with the requirements of Article 6(3) of the EU Habitats Directive."*

To ensure that this AAP does not have significant negative impacts upon the qualifying features for the cSAC, the following objectives have been incorporated into the plan.

4.2 AAP Objectives - Negating Impacts upon Knocksink Wood cSAC

Upon establishing the impact that future proposed developments may have upon the conservation objectives of the cSAC, wherever a potential impact is identified, mitigation measures need to be proposed to counteract this impact. Specific mitigation measures have been recommended in relation to the proposed AAP and these are listed as AAP Objectives below.

Recommendations to mitigate for impacts upon sensitive habitats at the planning application and/or detailed design stage for proposed developments within the AAP lands are outlined in the Ecological Assessment in Appendix B (Scott Cawley, 2014). Further ecological survey work may be required at the planning application and/or detailed design stage for some developments within this AAP site, as outlined in Section 3.10 of the AAP. This further survey work will advise on suitable mitigation so as to ensure that the developments are in line with the legislation and planning objectives set for the AA1 zone.

Mitigation to ensure the protection of the Knocksink Woods cSAC and its qualifying features of interest must be devised before any development occurs within the "inner catchment" zone for the tufa springs. The following objectives have been set out within the AAP report to ensure that this is the case:

Objective E1
As the possibility of a significant effect on Knocksink Woods cSAC has been established, refer to reports 'Hydrogeological Characterisation, Kilgarran Enniskerry' (Dr. Les Brown 2014) and 'Kilgarran Enniskerry, Ecological Assessment' (Scott Cawley, 2014), an Appropriate Assessment shall be required for all plans, projects and works proposed within the inner catchment zone (as indicated on Figure 23 in Section 2.4 of the AAP) which involve any of the following: interception or interaction with groundwater; dewatering or abstraction of groundwater; discharges to groundwater; or diversion, impeding, dilution or reduction of groundwater flow or quality. In undertaking an Appropriate Assessment of any such plans or projects particular attention shall be given to achieving compliance with Objective E2.

Objective E2
Any works proposed within the 'inner zone of catchment' area for the tufa springs (as shown on Figure 23 in Section 2.4 of the AAP), in particular the provision of buildings, utilities, roads and/or pathways and other works that break ground shall, prior to obtaining consent and/or commencing works, provide evidence in the form of a detailed impact assessment that there will be no significant impact on the hydrogeological, ecological and other physical conditions on which these springs rely. This detailed impact assessment will determine any potential changes in the water quality and water balance (recharge, storage and discharge) of the cSAC tufa springs and will examine the detailed design and assess impacts of subsurface works on groundwater flow and the risk of potential pollutants on receiving

waters. Collection of hydrogeological data may be required to demonstrate this. Detailed proposals for ensuring surface water recharge, in a suitable manner and location to ensure the continued supply of calcium-rich water to the springs, shall be provided for any works subject to this objective.

Objective E3
In order to ensure that the implementation of this Action Area Plan will avoid significant ecological effects, including on the Knocksink cSAC, all proposals for drainage and foul water infrastructure, treatment and disposal will be subject to a separate ecological assessment, screening for Appropriate Assessment and full Appropriate Assessment if necessary. These assessments will pay particular attention to any impacts on the Knocksink Woods cSAC and the habitats and species it supports, arising from temporary or permanent impacts associated with any proposals for works within the cSAC boundary or for proposals for discharges to the Glencullen River.

Objective E4
Individual developments and planning applications within this AAP will provide signage and educational information regarding the adjacent Knocksink Woods cSAC including encouragement for access to the woods only through the existing official pathways and entrance to the woods.

Objective E5
In order to mitigate future development at this site and to ensure the protection of the cSAC tufa springs and other ecologically valuable habitat which has been identified across the site, all works/projects (e.g. vegetation removal and/or demolition of the derelict gate house cottage) and any future planning applications at this site should refer to the Ecological Assessment provided by Scott Cawley in 2014. The recommendations within this report should be followed and advice should be sought from an ecologist in order to mitigate for impacts within the AA1 zone. Specific attention should be paid towards the potential impacts upon the cSAC and its qualifying features and potential impacts to protected species. This can be done by following the recommendations outlined within the Ecological and Hydrogeological Assessment reports and through ensuring careful planning of lighting design, native landscaping and the use of best practice during construction as outlined in the Ecological Assessment (Scott Cawley 2014).

Objective E6
A buffer zone of green open space (known as 'East Park' in the AAP) will be maintained alongside the margin of Knocksink Wood SAC, to serve as a protective band of vegetation in accordance with the identification of this area as being of high ecological sensitivity due to its proximity to the cSAC boundary and tufa springs. This buffer zone will not undergo development, and any proposed landscaping here will use native species in keeping with the existing cSAC habitats.

The risk of pollutants from construction activities (such as pilling and concrete works) escaping and entering ground and surface water, in turn, inflowing into the cSAC and the Glencullen River, has the potential to adversely affect water quality and the qualifying interests of this designated site. Release of sediment from excavation and earth works, will also pose a certain risk to water quality without appropriate mitigation in place. The impact of this is dependent on amount and type of pollutant released. This may be a high risk at this particular site as major excavations and other earthworks have not been undertaken here previously. Following the objectives above and best practice methods in construction, this will ensure that this risk is negated.

Services and Utilities in the AAP

Foul drainage from Action Area 1 will be collected through a system of underground sewers (yet to be designed) and discharged to the public sewer on R117 Monastery Road adjacent to the Parochial House for treatment in the Enniskerry Wastewater Treatment Plant. The sewer on Monastery Road, which may

need to be upsized from 150 mm diameter to 225 mm diameter, will be the main foul water outlet for Action Area 1. No on-site treatment of foul water is proposed for this AA1 zone.

The AA1 zone will be required to provide a Sustainable Urban Drainage System (SUDS) to manage the surface water and groundwater regimes on site. It will be a requirement that the proposed hard surfaces of Action Area 1 be drained through a SUDs system and the system will be based on a target of no additional drainage over the existing baseload. This will require a separate surface water network, attenuation where appropriate and measures to ensure that no contamination enters the surface water system. Surface water drainage from the impermeable areas of Action Area 1 (roofs, roads, paths, car parking etc.) will be collected through a system of underground sewers (yet to be designed) and discharged to an on-site attenuation and groundwater recharge area located in the eastern park.

The attenuation and recharge area has not yet been designed but it will incorporate permeable overground features such as infiltration trenches located at an elevation higher than 87 metres OD. Other features in the recharge area which would be subject to detail design at the planning application stage could include grassy swales, filter channels, filter drains and soakaways.

It is a requirement of the Kilgarron Action Area Plan that any development within the catchment area of the tufa springs will require an impact assessment to be undertaken at the planning application stage. The assessment will need to determine potential changes in the water balance (recharge, storage and discharge), design of subsurface work with impact assessment on groundwater flow and risk of potential pollutants on the receiving waters before it can proceed.

In order to mitigate the impact of development on the springs, it is a requirement of the Kilgarron Action Area Plan that any development within the catchment area of the tufa springs should provide a recharge area to be located adjacent to the springs. In addition, any development within the catchment area of the springs such as houses or roads should be located away from the springs. Construction depths should be kept to a minimum and foundations and services should be oriented in the direction of groundwater flow, this will all be subject to further comprehensive assessment at the detailed design stage.

Such development (including proposals for services and utilities) will be subject to its own separate ecological assessment, screening for Appropriate Assessment and full Appropriate Assessment if necessary as stated in the above objectives.

General Mitigation

Prior to commencement of construction, the contractor will implement the following measures through a Construction Method Statement (CMS). The CMS will be agreed in advance of construction with the local authority. These measures are based on the following best practice guidelines to ensure that water bodies are adequately protected during construction work:

- *Construction Industry Research and Information Association CIRIA C648: Control of water pollution from linear construction projects: Technical guidance (Murnane et al. 2006);*
- *CIRIA C648: Control of water pollution from linear construction projects: Site guide (Murnane et al. 2006);* and,
- *ERFB (2005). Inland Fisheries Ireland's Requirements for the protection of fisheries and habitats during construction and development works at river sites*

The construction contractor will implement the following mitigation measures, via the CMS, for release of sediment/silt control:

- Provision of measures to prevent the release of sediment during the construction work. These measures may include but not be limited to the use of silt fences, silt curtains, settlement lagoons, and filter materials. This is particularly important when undertaking any constructing/upgrading to the surface water drainage network on the development site;
- Provision of exclusion zones and barriers (sediment fences) between earthworks, stockpiles and temporary surfaces to prevent sediment washing into the receiving water environment;
- Temporary construction surface drainage and sediment control measures will be in place before earthworks commence;
- Pouring of cementitious materials for the works adjacent to surface water drainage features, or drainage features connected to same, will be carried out in the dry. Pumped concrete will be monitored to ensure no accidental discharge. Mixer washings and excess concrete will not be discharged to surface water. Concrete washout areas will be located remote from any surface water drainage features to avoid accidental discharge to watercourses;
- No storage of hydrocarbons or any polluting chemicals will occur within 50 m of the surface water network. Fuel storage tanks will be bunded to a capacity at least 110% of the volume of the storage tank. Re-fuelling of plant will not occur within 50 m of the surface water network and only in bunded refuelling areas;
- Emergency procedures and spillage kits will be available and construction staff will be familiar with emergency procedures;
- Implementation of measures to minimise waste and ensure correct handling, storage and disposal of waste (most notably wet concrete, pile arisings and asphalt); and,
- Response measures to potential pollution incidents.

4.3 Assessment of impacts on Conservation Objectives.

The crux of the AA process is to determine if the proposed Action Area Plan, as designed and proposed to be constructed whilst adopting certain mitigation measures, will result in adverse impacts on the Conservation objectives of the European Site.

Conservation Objective		Impact of proposed Action Area Plan
To maintain the favourable conservation condition of petrifying springs with tufa formation (*Cratoneurion*) in Knocksink Wood cSAC, which can be defined by the following list of attributes and targets:	▪ Habitat area should be stable or increasing, subject to natural process.	No direct impacts upon the tufa springs within Knocksink Wood cSAC (all works within the inner catchment for these springs will be subject to further detailed hydrogeological and impact assessments before they can proceed). Appropriate mitigation must be designed (in accordance with the AAP Objectives) to negate any impacts upon the cSAC and its qualifying interests.
	▪ Habitat distribution should have no decline.	
	▪ Hydrological regime should be maintained as appropriate.	
	▪ Oligotrophic and calcareous conditions should be maintained.	
	▪ Typical species should be maintained.	
To restore the favourable conservation condition of Alluvial forests with *Alnus glutinosa* and *Fraxinus excelsior* (*Alno-Padion, Alnion incanae, Salicion albae*) which can be defined by the following list of attributes and targets:	▪ Habitat area must remain stable or increasing.	No direct impact on locations of this habitat. Alluvial woodland occurs on heavy soils which are periodically inundated but which are otherwise well drained and aerated during low water (NPWS 2013). The alluvial woodland closest to the AA1 zone is buffered by a wide swathe of Oak-ash-hazel woodland and scrub. Although the woodland may also be
	▪ Habitat distribution must not decline.	
	▪ Woodland area must remain stable or increasing.	
	▪ Woodland structure must maintain a diverse structure with a closed canopy containing mature trees; subcanopy layer with semi-mature	

	trees and shrubs; and well-developed herb layer.	fed by groundwater it is likely to have much lower sensitivity to changes in groundwater than the springs due to buffering by the River (Personal Communication, Les Brown). A green area known as 'east park' will buffer the cSAC woodland from the proposed AAP. Landscaping in this area will follow detailed ecological advice and only native species, in keeping with the existing cSAC habitats may be planted here. As such, no significant impacts upon the alluvial woodland are deemed likely as a result of this AAP, as long as all associated objectives are strictly adhered to.
	▪ Diversity and extent of community types must be maintained.	
	▪ Seedlings, saplings and pole age-classes must occur in adequate proportions to ensure survival of woodland canopy.	
	▪ Maintain appropriate hydrological regime necessary for maintenance of alluvial vegetation.	
	▪ At least 30m^3/ha of fallen timber greater than 10cm diameter; 30 snags/ha; both categories should include stems greater than 40cm diameter (greater than 20cm diameter in case of alder).	
	▪ No decline in veteran trees.	
	▪ No decline in indicators of local distinctiveness.	
	▪ No decline in native tree cover (Native tree cover not less than 95%).	
	▪ A variety of typical native species present.	
	▪ Negative indicator species absent.	

If the above objectives and appropriate mitigation measures (discussed in Section 4.2) are adhered to fully during the implementation of the proposed Action Area Plan, then it may be concluded that the proposed AAP will not have an adverse effect on the integrity of the cSAC.

5 Conclusions of Assessment Process

This Natura Impact Statement was undertaken as part of the Appropriate Assessment process to identify any potential impacts from the proposed Kilgarron Hill AAP upon European Sites, specifically the Knocksink Woods cSAC which lies immediately adjacent to this site.

Potential significant risks to the aquatic environment relate to the potential for hydrogeological impacts and polluted surface water runoff (arising from future development projects within the AA1 Zone). Other significant effects may arise as a result of disturbance and the introduction of non-native/invasive species.

It was noted that the qualifying interests would be most sensitive to the effects of changes to the groundwater that feeds the inner catchment zone of the tufa springs that lie on the southern boundary of Knocksink Wood cSAC. As such, the objectives and recommendations above must be undertaken so that this AAP and any future development at this site will not result in significant impacts.

To conclude, it is anticipated that there is no risk that the proposed Action Area Plan, strictly adhering to the above objectives and with appropriate mitigation measures in place, would result in adverse effects on Knocksink Woods cSAC, its Qualifying Interests/Special Conservation Interests or its conservation objectives, either alone or in-combination with other impact sources.

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Note: Details on SACs/cSAC's and SPA's (e.g. Natura 2000 forms, Conservation Objectives and Site Synopses etc.) were obtained from http://www.npws.ie/protectedsites/

APPENDIX A – Dr. Les Brown Hydrogeological Characterisation Study

Hydrogeological Characterisation

Kilgarran, Enniskerry, County Wicklow



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September 2014

1. Introduction

Kilgarran is a proposed development site that lies on the southwestern outskirts of Enniskerry, County Wicklow. This hydrogeological characterisation has been commissioned by PricewaterhouseCoopers (receiver for Bluetone Properties Limited) at Kilgarran as part of an Appropriate Assessment being undertaken by Scott Cawley Ltd.

This report assesses the groundwater flow regime at the site with specific regard to tufa springs recorded by the National Parks and Wildlife Service (NPWS) adjacent to the site within the Knock Sink Wood candidate Special Area of Conservation (cSAC) as well as other springs within the development site. As defined by the project team, the objective of this report is to use the hydrogeological characterisation to estimate the risk that development at Kilgarran could have on these adjacent tufa springs. Additionally springs identified by Scott Cawley are to be assessed and considered for their hydrogeological importance.

The work undertaken includes a desk study of available data for the site, including databases held by the Geological Survey of Ireland, Teagasc, Ordnance survey of Ireland and the National Parks and Wildlife Service. Additionally, earlier hydrogeological assessments undertaken at the site by White Young Green (2000 and 2008) where made available for review.



Figure 1. Site boundary showing known hydrogeological features in proximity to the development site (additional features in the wider area are likely to exist but are not mapped, site boundary intended as guide only).

2. Location and Land Use

The Kilgarran site forms a strip of land between local road L1011 at Powerscourt golf club and the Glencullen River at Knocksink Wood (Figure 1). The local topography is locally steep nearing the Glencullen River, which has a steeply incised valley at Knocksink Wood. Further away west from the Glencullen River the topography becomes more gradual steadily rising to the Wicklow Mountains to the west.

Land use comprises of livestock grazing but also includes recreational facilities at a GAA club that adjoins the L1011 road. The corridor along the L1011 from Enniskerry is residential, which includes a mix of developments that are on private wastewater treatment systems and mains.

3. Hydrological setting

The site lies adjacent to the Glencullen River at its confluence with the Dargle River, before flowing through Enniskerry. A small tributary drains the area immediately north of the site. However, the site itself has very little surface water, which is restricted almost entirely to spring and seepages (Photos 1-2) that infiltrate back to ground, or the tufa springs (Photos 3-4) that emerge from the steep sided banks of the Glencullen River. The only drains at the site are small scale and associated with springs or seepages and these prevent ponding by allowing the flows to dissipate and infiltrate back to ground.

In this part of Ireland on the eastern seaboard but near the Wicklow Mountains, ground with elevation of approximately 110-80m above datum would be expected to generate effective rainfall of approximately 640mm/yr, most of which would be generated between September and March. The lack of drains at the site supports that the soils and subsoils at Kilgarran have high recharge acceptance owing to significant permeability and that surface run-off will only be associated either temporally due to very intense rainfall or spatially where there is steep topography.



Photo 1. Emergent spring that infiltrates to ground (Spring 1. Refer to Fig 1)



Photo 2. Steep slope with seepage line (Spring 3 refer to Fig 1)



Photo 3. Tufa spring (Spring 7 refer to Fig 1)



Photo 4. Tufa precipitate (Spring 7 refer to Fig 1)

4. Geology

The Geological Survey of Ireland map and memoir for Dublin and Wicklow shows the site to be underlain entirely by the fine-grained metamorphic rocks (generally phyllite) that are grouped together as the Maulin Formation, which names after Maulin hill in the Wicklow Mountains. This group of rocks are of Cambrian age and being some of the oldest in Ireland tend to be hard and indurated.

These rocks are overlain by subsoils and soils that are derived for the more recent geological history in the region where weathering and erosion has stripped the geology and deposited sediments. At Kilgarran the subsoils are glacial in origin that are derived from limestone located further to the north. With the parent material for these subsoils being limestone then the subsoil itself is highly calcareous.

Teagasc mapping shows that at the surface the subsoils comprise of sands, and gravels. Ground investigations undertaken by WYG (2000 & 2008) included a number of boreholes, trial pits as well as geophysics (EM31, resistivity and seismic refraction) and the data from these prove that although the upper part of the subsoil sequence is dominated by sands and gravels (with pockets of clay) that the underlying subsoil is largely dominated by clay which blankets the bedrock across most of the site. These investigations by WYG confirm that the sand and gravels are generally 2-5m thick with some thickening towards the Glencullen and Dargle rivers. These data also confirm that the underlying clay is continuous and can have significant thickness.

As such, the bedrock, subsoil and soil sequence comprises of hard indurated phyllite overlain by a blanket of clay dominated till that is then overlain by sand and gravels and with a sandy dominated soil.

5. Hydrogeology

The hard and indurated rocks of the Maulin Formation only have significant potential for groundwater where faulting or fracturing occurs. On this basis the bedrock below the site is considered to only have locally potential importance (LI) and are not considered to be significant as an aquifer.

Although sands and gravels are present at the site their restricted thickness reduces their potential as an aquifer to having local importance only. The underlying clay subsoils will form a hydraulic barrier between the bedrock and the sands and gravels effectively forming a tiered groundwater system with groundwater in the bedrock being confined and groundwater in the sands and gravels being free draining.

The nature of this tiered aquifer system is important for conceptualising the pathways, hydrochemistry and flow mechanisms for the tufa springs that have formed in the valley side of the Glencullen River. Based on this hydrogeology there are two potential sources of the emergent groundwater: (1) the groundwater perched above the clay blanket in the sands and gravels and (2) groundwater flowing through fracture systems in the underlying bedrock. Both of these are assessed below.

The groundwater present in the sand and gravel deposit will receive recharge across the site in the form rainfall. This recharge will infiltrate to a water table with a saturated thickness from the top of clay subsoils. Groundwater in the sands and gravels is unconfined and will generally be free draining. As the thickness of sand and gravel is relatively thin (<5m) at the site then it is feasible that depressions in the topography or steep changes in gradient will allow emergence of groundwater where the water table breaches the surface. Furthermore as the recharge flows through this permeable matrix it will become increasingly saturated with calcium carbonate from limestone rock fragments that are part of the sand and gravel sediments. As such, with longer flow through times the water will become gradually more mineralised and harder.

By contrast the groundwater in the underlying bedrock is confined by the clay subsoil and will receive insignificant recharge from the site. Furthermore, the groundwater is relatively restricted in volume due to the compact nature of the fine-grained strata. In conclusion, due to the confinement by clay, springs are unlikely to have their source in the bedrock. Furthermore, due to their non-calcium carbonate composition, these strata cannot provide the hydrochemistry required to form tufa springs.

On the basis of these two groundwater types the tufa springs are attributed to flow in the sands and gravels and the underlying confined bedrock is discounted as a potential source.

Layering of sands and gravels overlying dominated clayey till is common in Ireland and the stratigraphy of both generally tend to follow the land surface. The data presented by WYG in their 2000 and 2008 reports indicates that this layering is consistent across the site. As such, it is assumed that the water table in the sand and gravel generally follows the topography within this shallow layer. However, as discussed earlier, where there are sudden changes in gradient then the water table will come close to surface and there may be seepages and springs. This is certainly the case for the tufa springs.

Whilst, the focus of this report is the cSAC tufa springs there are several other springs at the site that have been assessed. In addition to the two tufa springs recorded in the valley sides of the Glencullen River there are 6 (No.) other springs recorded on the site. These springs are numbered as 1-6 with the cSAC tufa springs numbered as 7 and 8.

A description of each spring is given below so that these can be characterised in terms of importance for the site hydrogeology. For consistency these springs are numbered the same in both the ecology reports and this Hydrogeological Characterisation.

Spring 1

Spring 1 (refer to figure 1) in the centre of the site where a moderate spring emerges from relatively gentle topography. This location is likely to be due to

the water table rising to surface to overflow a barrier such as clay pocket. Tens of meters downslope the spring infiltrates back to ground.

The flow from this spring is reasonable at an estimated 3l/s in a shallow channel of up to 10cm deep. The point of emergence is at the fence boundary as flow from subsoils at a depth of c.30cm. Water is taken from the location for a cattle trough and a borehole has been sunk adjacent to this from a previous site investigation.

Water flows along the hedgerow downslope eventually infiltrating back to ground after c.70m. The spring indicates that the water table is very shallow at the site and even minor depressions in the topography will allow emergence of groundwater.

Spring 2

Spring 2 had a small seepage of groundwater at the time of the survey and the ground in the area was damp. The spring is located on steepening ground along the same contour as Springs 3 and 4 and may be associated with the same spring line. These occur where the water table nears the topography as the slope steepens.

Spring 3 & 4

The springs occur where seepages of groundwater occur. Flow was slight at the time of the survey and from zones rather than discrete points. Most likely part of the same spring line as spring 2.

Spring 5

Spring 5 is located down gradient from a property and there is evidence in the form of occasional concrete block and broken pipe that some work has been done at the location either for drainage or discharge. The location is noticeably damp from groundwater seepage but there is no flow to observe. Some small-scale precipitation of calcium carbonate is present. Considering the location and catchment for this spring then it is likely that it includes drainage from the adjacent property, which includes a large gravel drive that

appears to be constructed from limestone crushed aggregate. There may be a natural component to the seepage from groundwater but it appears that the main component of the flow is runoff/interflow from the property. This flow is largely dependant on the drainage and seepage characteristics within the private property.

Spring 6 (wastewater overflow)

Although not active at the time of the survey a remnant 'tide-mark' indicates that significant overflow had recently occurred from a wastewater manhole cover. The emergent effluent had stained the ground as it flowed away overland down slope. Such overflows are not normal and it is likely that the system is in a bad state of repair. There is no evidence that this overflow is spring related and from an estimation of the groundwater contours the water table is expected to be c.1m below the surface. It is not known what type of treatment system is installed.

Spring 7 and 8

Of the springs identified in Knocksink Wood one has perennial tufa deposition (spring 7 refer to Figure 1). There are other locations in Knocksink Woods that are potentially ephemeral springs or seepage points, however, at the time of the survey these were dry. One potential location that matches a spring site recorded in NPWS database is located approximately 60m east of the main spring. Although dry at the time of the field visit this spring is likely to be ephemeral and is numbered as spring 8 for this study.

In terms of the hydrogeology spring 7 is is a good example of a perennial tufa spring emerging from a sand and gravel deposit. Tufa has coated the gravels along the main channel. The landforms in the location indicate that the flow does vary throughout the year increasing during autumn and winter. Survey was undertaken during the summer time when flow was low.

There is likely to be a seasonal variation in the flow from spring 7, which is related to the rise of the water table from September and its decline after

March. The perennial characteristic of spring 7 is an indication of sufficient storage capacity in the sand and gravel.

There are indications of further seepages but at the time of the survey these were not flowing. It is likely that multiple seepages and springs become active when the water table rises during autumn and winter.

6. Extent of Catchment to Tufa Springs

The tufa springs at Knocksink Wood are fed by groundwater through sand and gravels deposits. The catchment for a spring in an unconfined sand and gravel aquifer can generally be delineated using the topography of the area. In this case the catchment for these springs will include the area immediately up gradient, particularly the steep topography between the tufa springs and Kilgarran House.

The springs were observed during the summer period where the flow was estimated visually to be 0.02-0.04l/s, which is quite low and certainly not indicative of a substantial catchment. It is unknown how the flow increases in the winter period. Based on the annual average recharge and assuming a conservative average annual flow of 0.1l/s then it is estimated that a catchment of 5,000m^2 could generate this flow rate, which would approximately equate to the area of steep topography immediately behind the springs.

The catchment can be refined by excluding the northern part of the site that drains northwards towards an unnamed tributary to the Glencullen upstream. Furthermore, the south-eastern corner of the site next to St Mary's Church is outside of the catchment as it lies oblique to the tufa springs.

An inner zone forms the core of the catchment and encompasses the immediate area where an impact would modify the qualitative or quantitative conditions at the spring. The zone of contribution may extend beyond the inner zone however the impact would be either attenuated by recharge in the inner zone reducing the impact or may even be outside of the catchment. The site has been accordingly delineated showing the inner zone as well as upper zone and central zone (Figure 2).

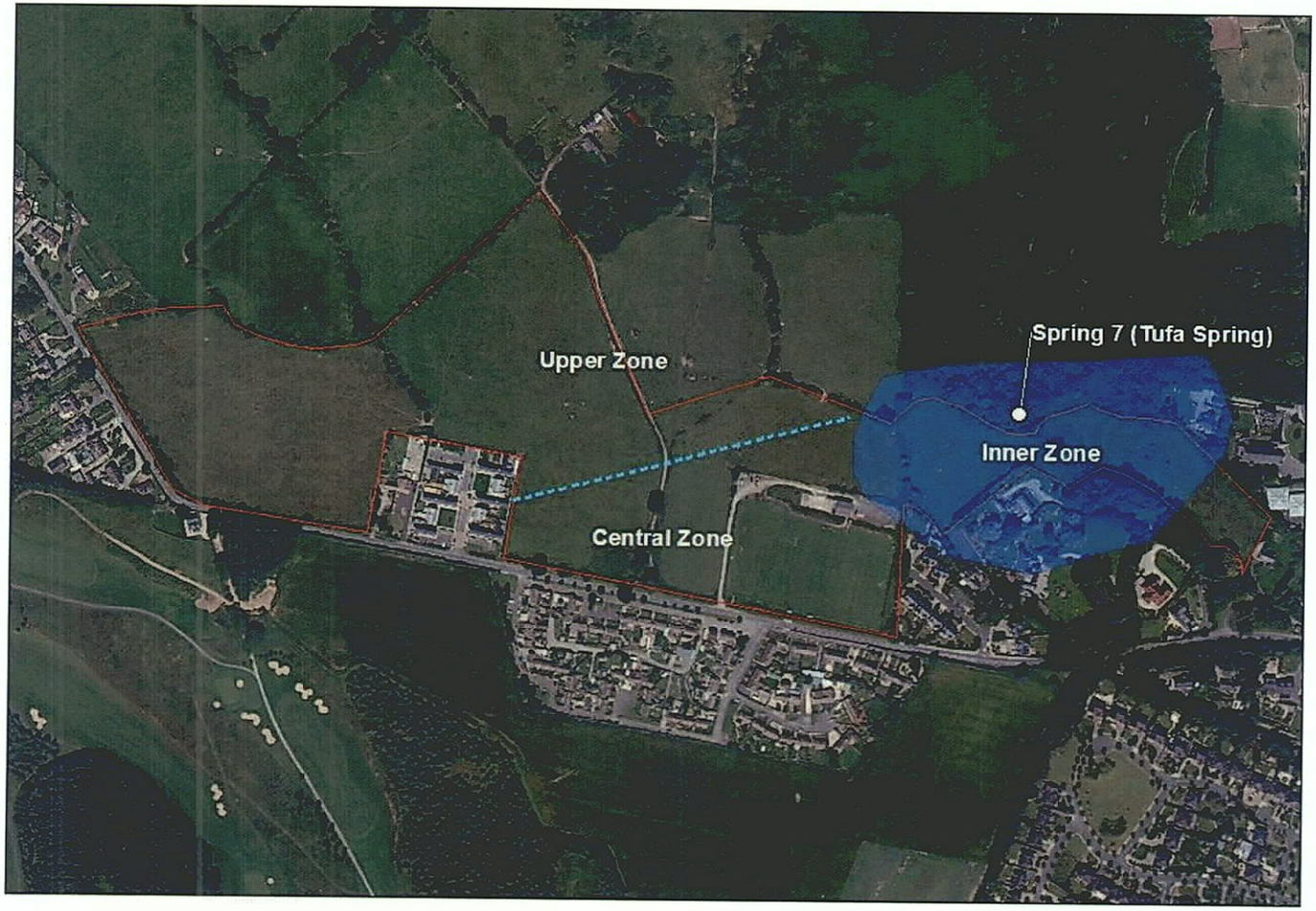

Figure 2. Estimation of the inner zone to the catchment of the tufa springs (with upper and central zones annotated).

7. Potential Impacts

Impacts at the site may be divided into three aspects: (1) potential impacts to the springs and seepages upper zone of the site (2) potential impacts to springs and seepages in the central zone of the site and (3) potential impacts to the tufa springs in the cSAC and its main catchment (inner zone).

Upper zone

The upper, western part of the site is likely to drain north-eastwards to an unnamed tributary. As this unnamed tributary joins the river upstream of the tufa springs then it and the groundwater catchment feeding it will form a separate catchment to the tufa springs. In this upper part of the site the groundwater level will remain high but the consequences of excavation works and development in general are of low risk to the tufa springs. There is moderate risk to spring 1, which may reduce in flow if any abstractions or diversions occur due to works in its vicinity.

The stream from spring 1 infiltrates back to ground relatively quickly before entering the inner zone and as such it is unlikely that the water emerging at spring 1 is part of the catchment for the tufa springs. It is more likely for these waters that seepage occurs into the river further up gradient of the tufa springs.

Central zone

Springs 2, 3 and 4 are located on the boundary between the central and inner zones (refer to figure 2). As with most of the site the water table is expected to be <0.5m below ground. With this in mind excavation in the central zone is likely to intercept the shallow water table and any lowering of the water table has the potential to impact on flow at springs 2, 3 and 4.

Dewatering or flow diversion in the central area is unlikely to impact on the tufa springs due to the significant separation distance. However, there may be localised impacts to the line of springs at 2, 3 and 4.

Inner zone for tufa springs (springs 7 & 8)

The ground immediately up gradient to the tufa springs forms their inner zone and is capable of providing the recharge and storage estimated for these springs. This zone includes the steeply sloping ground immediately to the southwest of the site, which includes springs 5 & 6 as indicated in Figure 1.

Springs 2, 3 and 4 lie on the interface of the central part of the site with the inner zone. These springs are seepage points that form a line where the water table intersects the steepening topography. All spring flows infiltrate back to ground within 10m, indicating that the water table also steepens and falls below surface. As these springs lie on the periphery of the inner catchment of the springs it is unlikely that a reduction in their flow will have a significant impact on the tufa springs.

Springs 5 and 6 have been examined as part of this survey and are considered to be largely anthropogenic inputs to the inner zone. Spring 5 is largely due to runoff/interflow from an adjacent private property whilst spring 6 is a periodic overflow of wastewater. Whilst the flow from spring 5 should be considered to be part of the catchment to the tufa springs, the occasional discharge from the wastewater overflow at 6 is not desirable and presents a risk to water quality at the tufa springs.

Being the main catchment it is likely that the tufa springs will be sensitive to changes in groundwater quality and groundwater quantity in the inner zone. Impact to the springs would occur if there were changes to either quantity or quality of the groundwater in this zone. For example:

- Abstraction by interception of groundwater is likely to reduce flow at the spring by the abstracted amount potentially rendering the spring dry or seasonal.
- Dilution or mixing of the groundwater, for example with storm discharges, will have a direct impact on the hydrochemistry of the spring and may lead to cessation of tufa precipitation.

There are other tufa springs within the cSAC (e.g. south of St Mary's church and further north of the development site on both banks of the Glencullen River). However, these other springs are outside of the zone of influence of the proposed development and therefore are not at risk.

8. Guidance

It is recommended that any works undertaken in the inner zone of the catchment should not abstract from or discharge to groundwater. Further more, ground works in this area should not divert, impede, dilute or reduce groundwater flow or quality.

It is recommended that if ground works, abstractions or discharges are to be undertaken for construction or operation in the inner catchment zone that a site specific assessment should be conducted to assess potential impact to cSAC. These works are likely to include installation of shallow groundwater monitoring wells in order to determine baseline conditions (water level and water quality) to monitor during and after construction.

9. Cited References

WYG 2000. Report on the Drilling and Testing of Trial Wells at Parknasilloge, Enniskerry, Co. Wicklow.

WYG 2008. Hydrogeological Assessment for a Seepage at Kilgarran Hill, Enniskerry, Co. Wicklow for Treasury Holdings Ireland.

APPENDIX B – Scott Cawley Ecological Assessment and Dr. J. Denyer Botanical Assessment

scott cawley

ECOLOGICAL ASSESSMENT OF LANDS AT KILGARRAN HILL, ENNISKERRY, CO. WICKLOW

TO INFORM THE DEVELOPMENT OF AND ASSESS IMPACTS OF AN ACTION AREA PLAN

Prepared for

BLUETONE PROPERTIES LIMITED (IN RECEIVERSHIP),

C/O WILLIAM O'RIORDAN AND DECLAN MCDONALD,

JOINT RECEIVERS,

PRICEWATERHOUSECOOPERS.

Project Reference	Rev.	Status	Author	Reviewed By	Approved By	Issue Date
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TABLE OF CONTENTS

Executive Summary 3

1 .... INTRODUCTION 4
1.1 .... Overview – Site Description 5

2 .... METHODOLOGY 5
2.1 .... Desktop Study & Consultation 5
2.2 .... Desktop Data Research 6
2.2.1 .... Designated Areas 6
2.2.2 .... Protected and Notable Species 20
2.3 .... Field Survey & Assessment 25
2.4 .... Limitations 26

3 .... RESULTS 27
3.1 .... Field survey results 27
3.1.1 .... Habitats and Flora 27
3.1.2 .... Fauna 31

4 .... Ecological Assessment 35
4.1 .... Key Constraints 35
4.2 .... ecologically sensitive design of the AAP 38
4.3 .... Key Impacts of the AAP 39

5 .... Recommendations 39

EXECUTIVE SUMMARY

Scott Cawley Ltd. was commissioned by PricewaterhouseCoopers to undertake an ecological assessment of lands at Kilgarran Hill, Enniskerry, Co. Wicklow in order to inform the design of a proposed Area Action Plan (AAP) for this zone. A desktop study was undertaken which identified relevant designated sites, namely, the Knocksink Wood candidate Special Area of Conservation (cSAC) which abuts the proposed development site. The Knocksink Woods cSAC is also designated as a proposed Natural Heritage Area (pNHA).

The AAP site underwent a number of surveys which included habitat mapping (according to Fossitt, 2000), protected species, botanical and hydrogeological assessments. The most ecologically sensitive habitats on, or within close proximity to, the AAP site include the Annex I priority habitat petrifying springs with tufa formation (FP1); a portion of the Oak-ash-hazel Woodland (WN2) within Knocksink Wood cSAC that abuts the AA1 zone; and, a small area of marsh (GM1) outside of the AA1 zone, to the north-west. Annex I habitat Alluvial forests with *Alnus glutinosa* and *Fraxinus excelsior'* (WN4), for which the cSAC is also designated, can be found outside of the AAP and is buffered by a wide swathe of the oak-ash-hazel woodland. There is one derelict cottage on the site which is surrounded by scrub and mature trees (with the potential to support roosting bats), and the majority of boundaries are comprised of hedgerows (WL1) with some mature trees, some of which are deemed to be category 1 potential bat roost trees according to guidelines (Hundt, 2012).

This ecological assessment provides baseline information regarding the current ecological condition of the site and evaluates the key potential ecological impacts of the AAP (AA1 Zone). The areas which are the most sensitive to such impacts have been highlighted. The recommendations from this study have gone on to inform the AAP objectives in relation to ecology at this site.

This report should be read in conjunction with the *Hydrogeological Characterisation Kilgarran, Enniskerry, County Wicklow*. Dr. Les Brown, 2014. Impacts upon the 'inner catchment' for the springs at the AAP site could ultimately have an effect upon their character or water quality.

Future development within the AA1 zone should consider the potential for protected species such as Bats, Badgers and breeding birds to be on site or in the immediate vicinity. As such, they should be subject to appropriate up-to-date surveys where necessary. To avoid programme delays, all such work should be carried out within the correct season and well in advance of construction works commencing.

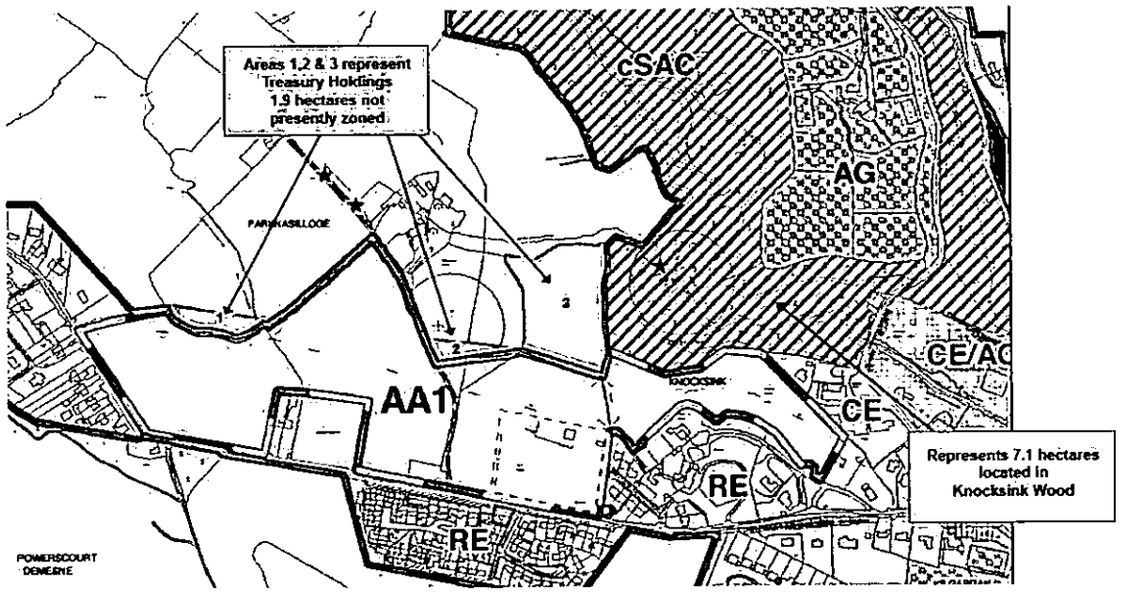
ECOLOGY ASSESSMENT

1 INTRODUCTION

Scott Cawley Ltd. was commissioned by the client to undertake an ecological assessment of lands at Kilgarran, Enniskerry. This work included an initial Ecological Constraints Assessment to inform the development of the Area Action Plan (AAP) prior to undertaking a further ecological assessment of the draft AAP to inform objectives for this plan and future development at this site.

This report covers the area which has been zoned for the preparation of an AAP (the AA1 zone) as seen below, and takes into consideration sensitive habitats immediately adjacent to this AAP site.

Figure 1: Areas Zoned for Potential Future Development (Source: Client)



The aims of this Ecology Assessment were to:

- Identify the baseline ecological data of the AAP site;
- Identify ecologically sensitive areas within and immediately surrounding the AAP site;
- Assess the key potential impacts of developing this site upon ecological features of value;
- To recommend mitigation measures or further surveys for inclusion within the AAP which can avoid, reduce, remove or compensate impacts; and,
- To inform objectives for the AA1 zone which endeavour to conserve and enhance the ecological value of the site while safeguarding the Knocksink cSAC and its qualifying features of interest, specifically the 'Petrifying springs with tufa formation *(Cratoneurion)'*.

1.1 Overview – Site Description

The AAP site is located on the lower slopes of Kilgarran Hill, to the northwest of the old Enniskerry village. The eastern side of the AAP site slopes steeply towards Knocksink Wood cSAC/pNHA, St Mary's Church, Parochial House and Primary School with the slope inclining in a northerly direction. The western most fields are less steep and are bordered by existing residential houses to the west and south as well as adjacent agricultural fields. These lands are dominated by grassland that has been improved for agriculture and amenity use. The majority of fields are bordered by hedgerows/mature lines of trees, Knocksink Wood cSAC/pNHA and an area of planted broadleaved woodland beside an existing residential property.

2 METHODOLOGY

2.1 Desktop Study & Consultation

A desktop study was carried out to collect available information on the ecology of the area which included the following sources:

- Ordnance Survey of Ireland mapping and aerial photography available from www.osi.ie;
- Environmental Protection Agency map view http://gis.epa.ie/Envision;
- Online data available on European Sites (Natura 2000 Sites) and protected species as held by the National Parks and Wildlife Service (NPWS) from www.npws.ie;
- Biodiversity data available from http://maps.biodiversityireland.ie/#/Map; and,
- Records of known bat roosts within 10km of the site from Bat Conservation Ireland.

In addition, consideration has been given to the following guidance:

- *Guidelines for the Ecological Impact Assessment in the United Kingdom* (Institute of Ecology and Environmental Assessment 2006);
- *Guidelines for Assessment of Ecological Impacts of National Road Schemes* (National Roads Authority 2009);
- *Bat Surveys: Good Practice Guidelines, 2nd Edition, Bat Conservation Trust* (Hundt L 2012); and,
- *Ecological Surveying Techniques for Protected Flora and Fauna during the Planning of National Road Schemes* (National Roads Authority 2006).

National Parks and Wildlife Service

The National Parks & Wildlife Service (NPWS) was contacted to obtain data and local knowledge of the site. All relevant data received have been incorporated into this report and have informed this assessment.

Environmental Protection Agency

Approximately one third of this site slopes in a north-easterly direction towards Knocksink Wood cSAC/pNHA. Watercourses from the proposed site for development drain directly into Glencullen River within the Knocksink Wood which lies immediately beside the site to the north-east. The Glencullen River is listed on the Environmental Protection Agency (EPA) maps as being 'At Risk of Not Achieving Good Status' under the EU Water Framework Directive criteria. This tributary river flows in an easterly direction into the Dargle which reaches the Irish Sea at Bray. The Glencullen River is a tributary of the River Dargle which supports both trout and salmon. Salmon have been known to spawn in this tributary river (Enniskerry LAP 2009 – Managers report on submissions to draft plan, February 2008).

2.2 DESKTOP DATA RESEARCH

2.2.1 Designated Areas

Special Areas of Conservation (SAC) are designated under the Habitats Directive (92/43/EEC). This Directive enables the protection, conservation and restoration of certain habitats and/ or species (habitats listed on Annex I, and species listed on Annex II/IV of the Habitats Directive). Designated SACs are compiled within a framework of protected areas known as Natura 2000 or *European Sites*. In Ireland candidate SAC's are afforded the same level of protection as SACs.

Special Protection Areas (SPAs) are designated under the Birds Directive (79/409/EEC). SPAs are designated to protect birds listed on Annex I of the Birds Directive, as well as for populations of regularly occurring migratory species. The Birds Directive obliges member states to conserve wetlands, especially those of international importance.

The Birds and Habitats Directives are principally transposed into Irish law by the European Communities Birds and Natural Habitats Regulations 2011 (as amended).

Natural Heritage Areas are designated and protected under the Wildlife Act 1976 (as amended), while proposed Natural Heritage Areas (pNHAs) are offered some level of protection until such time as they are fully designated, under development plans.

The easternmost fields within the AAP site adjoin the cSAC/pNHA.

There are a number of other designated sites within 2km of the AAP lands. These are shown in Figure 2 and sites within 15km of the AA1 zone are listed in Table 1 below.

Figure 2: Designated sites within 2km of the AA1 Zone

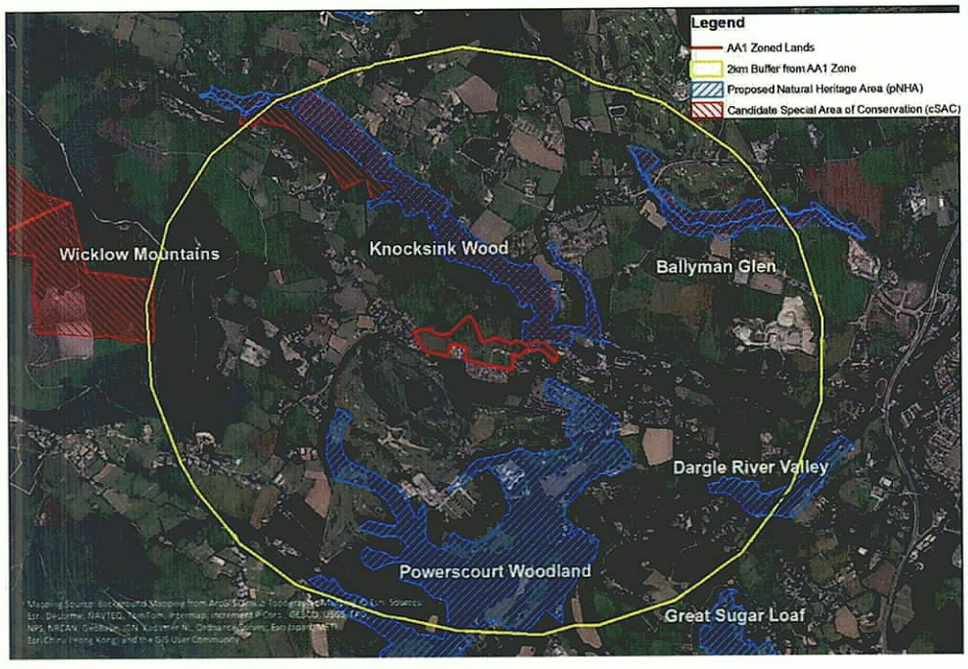


Table 1 – Designated Sites that lie within 15km of the AAP lands at Kilgarran, Enniskerry (See Figure 2 above for a 2km buffer in relation to AA1 zone).

Table 1. Qualifying Interests, Conservation Status, Management Objectives, Conditions underpinning site integrity for relevant European sites					
Site Name & Code	**Approximate distance from Site**	**Qualifying Interests** (*Priority Annex I Habitat for Conservation)	**Current Conservation Status**[1]	**Conservation Management Objectives**	**Relevant Site Conditions**
Candidate Special Areas of Conservation					
Rockabill to Dalkey Island cSAC (003000)	*c.*8,300m	Annex I habitats: • [1170] Reefs Annex II species: • [1351] Harbour porpoise *Phocoena phocaena*	• Reefs – Bad (Declining) • Harbour porpoise – Favourable	• To maintain the favourable conservation condition of Reefs in Rockabill to Dalkey Island SAC; • To maintain the favourable conservation condition of harbour porpoise in Rockabill to Dalkey Island SAC.[2]	• Tidal currents • Water levels • Erosion and deposition rates • Water quality • Foraging Habitat • Food supply • Appropriate levels of disturbance • Air quality
South Dublin Bay cSAC (000210)	*c.*11,300m	Annex I habitats: • [1140] Mudflats and sandflats not covered by seawater at low	• Mudflats and sandflats not covered by seawater at low tide – Inadequate (Improving)	To maintain or restore the favourable conservation condition of the Annex I habitat(s) and/or the Annex II species for which the SAC	• Water quality including nutrient levels, water clarity, sediment levels • Erosion and deposition rates

[1] Sourced from Status of *EU Protected Habitats and Species in Ireland* (NPWS, 2013a & 2013b) for cSACs, and from *Birds of Conservation Concern in Ireland 2014-2019* (Colhoun & Cummins, 2013) for SPAs.

[2] Sourced from Site Conservation Objectives (http://www.npws.ie/publications/archive/003000_Rockabill%20to%20Dalkey%20Island%20SAC%20Marine%20Supporting%20Doc_V1.pdf accessed 24/03/14) – Detailed conservation objectives (attributes and targets) can be seen here.

Table 1 Qualifying Interests, Conservation Status, Management Objectives, Conditions underpinning site integrity for relevant European sites

Site Name & Code	Approximate distance from Site	Qualifying Interests (*Priority Annex I Habitat for Conservation)	Current Conservation Status[1]	Conservation Management Objectives	Relevant Site Conditions
		tide		has been selected: • Mudflats and sandflats not covered by seawater at low tide [1140][3]	• Controlling bait digging • Land reclamation for industrial / infrastructure usage • Maintaining appropriate levels of disturbance • Tidal currents
Wicklow Mountains SAC (002122)	*c.*1,950m	Annex II Species: • [1355] *Lutra lutra* Annex I Habitats: • [3130] Oligotrophic to mesotrophic standing waters (Soft Water Lakes) with vegetation of the *Littorelletea uniflorae* and/or of the *Isoëto-Nanojuncetea*	• Otter – Favourable • Soft Water Lakes – Inadequate (Stable) • Dystrophic Lakes – Inadequate (Declining) • Wet Heath – Bad (Stable) • Dry Heaths – Bad (Stable) • Alpine and subalpine heath – Bad (Improving) • Species-rich *nardus*	• To maintain and where possible enhance the ecological value of all natural and semi-natural habitats and geological features within Wicklow Mountains National Park (WMNP) – blanket bog, heath, lakes and rivers, woodlands, exposed rock, grasslands and scrub. • To maintain and where possible increase the populations of rare and protected plant and animal species including Lanceolate Spleenwort, Parsley Fern, Small White Orchid, Bog Orchid, Peregrine Falcon, Merlin and Otter.	• Grazing of bog, heath, rocky habitats and woodland • Peat extraction and burning • Spread of non-native species • Disturbance to Habitats and Species • Peat erosion (e.g. through grazing and hill walking disturbance)

[3] Sourced from South Dublin Bay cSAC Conservation Objectives (http://www.npws.ie/publications/archive/000210_South%20Dublin%20Bay%20SAC%20Marine%20Supporting%20Doc_V1.pdf accessed 23/12/14) – Detailed conservation objectives (attributes and targets) can be seen here.

Table 1 Qualifying Interests, Conservation Status, Management Objectives, Conditions underpinning site integrity for relevant European sites

Site Name & Code	Approximate distance from Site	Qualifying Interests (*Priority Annex I Habitat for Conservation)	Current Conservation Status[1]	Conservation Management Objectives	Relevant Site Conditions
		• [3160] Natural dystrophic lakes and ponds • [4010] Northern Atlantic wet heaths with *Erica tetralix* • [4030] European dry heaths • [4060] Alpine and Boreal heaths • [6230]* Species-rich *Nardus* grasslands, on siliceous substrates in mountain areas (and submountain areas, in Continental Europe) • [7130] Blanket bogs (* if active only) • [8110] Siliceous scree of the montane to snow levels (*Androsacetalia alpinae and Galeopsietalia ladani*) • [8210] Calcareous	upland grassland* – Bad (Declining) • Blanket bogs – Bad (Declining) • Siliceous scree – inadequate (Improving) • Calcareous Rocky Slopes – Inadequate (Stable) • Siliceous Rocky Slopes – Inadequate (Stable) • Old oak woodlands – Bad (Improving)	• To establish and continue effective liaison with all interested parties in order to effectively manage WMNP. To encourage sustainable recreational and educational use of WMNP, to provide information and facilities for visitors and to improve public awareness of the natural heritage of the area, taking into account the social and economic needs of the communities in the area. • To maintain cultural features within WMNP, particularly those associated with the monastic settlement at Glendalough. • To maintain landscape, aesthetic and other qualities in the environs of WMNP, through liaison with neighbouring landowners and others concerned. • To undertake or facilitate research necessary to achieve the conservation objectives. • To purchase, if desirable, lands and rights, in areas adjacent to WMNP, should they become available, by mutual agreement, in order to consolidate existing WMNP lands.[4]	

[4] Wicklow Mountains National Park (WMNP) Management Plan for 2005 - 2009 (www.npws.ie accessed 23/12/14)

Table 1 Qualifying Interests, Conservation Status, Management Objectives, Conditions underpinning site integrity for relevant European sites

Site Name & Code	Approximate distance from Site	Qualifying Interests (*Priority Annex I Habitat for Conservation)	Current Conservation Status[1]	Conservation Management Objectives	Relevant Site Conditions
		rocky slopes with chasmophytic vegetation • [8220] Siliceous rocky slopes with chasmophytic vegetation • [91A0] Old sessile oak woods with Ilex and Blechnum in the British Isles			
Knocksink Wood cSAC (000725)	Immediately adjacent to AA1 zone	Annex I habitats: • [7220] Petrifying Springs* • [91E0] Alluvial Forests*	• Petrifying Springs – Inadequate (Stable) • Alluvial Forests – Bad (Improving)	To maintain or restore the favourable conservation condition of the Annex I habitat(s) and /or the Annex II species for which the SAC has been selected: • *Petrifying springs with tufa formation (*Cratoneurion*) [7220] • Alluvial forests with *Alnus glutinosa* and *Fraxinus excelsior* (*Alno-Padion, Alnion incanae, Salicion albae*) [91E0][5]	• Recreational Activities • Land reclamation for industrial / infrastructure usage • Water quality including nutrient levels, water clarity, sediment levels • Maintaining appropriate levels of disturbance

[5] Detailed Conservation Objectives are not yet available for this site as such Table 2 illustrates the detailed conservation objectives for similar habitats that have been written for other cSAC sites, e.g. River Barrow and River Nore SAC (site code 2162) Conservation objectives supporting document woodland habitats.

Table 1: Qualifying Interests, Conservation Status, Management Objectives, Conditions underpinning site integrity for relevant European sites

Site Name & Code	Approximate distance from Site	Qualifying Interests (*Priority Annex I Habitat for Conservation)	Current Conservation Status[1]	Conservation Management Objectives	Relevant Site Conditions
Bray Head cSAC (000714)	*c.*5,400m	Annex I Habitats: • [1230] Vegetated sea cliffs of the Atlantic and Baltic coasts • [4030] European dry heaths	• Sea cliffs – Inadequate (Stable) • Dry heaths – Bad (Stable)	• To maintain the Annex I habitats for which the cSAC has been selected at favourable conservation status; European dry heaths (54% area of the site) and Vegetated sea cliffs of the Atlantic and Baltic coasts (6% area of the site) • To maintain the extent, biodiversity and species richness of the site; • To establish effective liaison and co-operation with landowners, legal users and relevant authorities[6]	• Reclamation of grassland & Heathland Habitats • Burning of the Heath • Recreational Activities
Ballyman Glen cSAC (000713)	*c.*1,300m	Annex I Habitats: • [7220] * Petrifying springs with tufa formation (*Cratoneurion*) • [7230] Alkaline fens	• Petrifying Springs – Inadequate (Stable) • Alkaline fens – Bad (Unknown)	To maintain or restore the favourable conservation condition of the Annex I habitat(s) and /or the Annex II species for which the SAC has been selected: • *Petrifying springs with tufa formation (*Cratoneurion*) [7220] • Alkaline fens [7230] Other conservation objectives for similar sites include[7]: • To maintain the extent, species richness and diversity of the entire site • To establish effective liaison and co-	• Over Extraction of water from spring • Agricultural Run-Off

[6] Detailed conservation objectives are obtained here: http://www.npws.ie/media/npwsie/content/images/protectedsites/conservationstatement/CS000714.pdf

[7] Detailed conservation objectives for Petrifying Springs can be seen in Table 2 and more detailed conservation objectives for Alkaline Fen can be sourced from: Huggingstown Fen cSAC Conservation Statement at http://www.npws.ie/media/npwsie/content/images/protectedsites/conservationstatement/CS000404.pdf

Table 1 Qualifying Interests, Conservation Status, Management Objectives, Conditions underpinning site integrity for relevant European sites

Site Name & Code	Approximate distance from Site	Qualifying Interests (*Priority Annex I Habitat for Conservation)	Current Conservation Status[1]	Conservation Management Objectives	Relevant Site Conditions
				operation with landowners, legal users and relevant authorities	
Carrigower Bog cSAC (000716)	*c.*9,300m	Annex I Habitats: • [7140] Transition mires and quaking bogs	• Transition mires – Bad (Unknown)	• To maintain the Annex I habitat for which the cSAC has been selected at favourable conservation status; Transition mires and quaking bogs (22% area of the site). • To maintain the extent, species richness and biodiversity of the entire site. • To establish effective liaison and co-operation with landowners, legal users and relevant authorities.[8]	• Land drainage • Grazing levels • Agricultural intensification • Forestry
Glenasmole Valley cSAC (001209)	*c.*11,200m	Annex I Habitats: • [6210] Semi-natural dry grasslands and scrubland facies on calcareous substrates (*Festuco Brometalia*) (*important orchid sites) • [6410] *Molinia* meadows on	• Orchid-rich calcareous grassland – Bad (Stable) • Molina meadows – Bad (Declining) • Petrifying Springs – Inadequate (Stable)	To maintain the Annex I habitats for which the cSAC has been selected at favourable conservation status; • Petrifying springs with tufa formation (*Cratoneurion*) (<1% area of the site), Semi-natural dry grassland and scrubland facies on calcareous substrates (*Festuco Brometalia*) (20% area of the site) and Molinia meadows on calcareous, peaty or clayey-silt-aden soils (*Molinion caeruleae*) (2% area of the site) • To maintain the extent, species richness	• Modern Agricultural Intensification

[8] More detail on Conservation Objectives for this site can be found within the Conservation Statement here: http://www.npws.ie/media/npwsie/content/images/protectedsites/conservationstatement/CS000716.pdf

Table 1 Qualifying Interests, Conservation Status, Management Objectives, Conditions underpinning site integrity for relevant European sites

Site Name & Code	Approximate distance from Site	Qualifying Interests (*Priority Annex I Habitat for Conservation)	Current Conservation Status[1]	Conservation Management Objectives	Relevant Site Conditions
		calcareous, peaty or clayey-silt-laden soils (*Molinion caeruleae*) • [7220] * Petrifying springs with tufa formation (*Cratoneurion*)		and biodiversity of the entire site • To establish effective liaison and co-operation with landowners, legal users and relevant authorities.[9]	
Glen of the Downs cSAC (000719)	c.6,750m	Annex I Habitats: • [91A0] Old sessile oak woods with Ilex and *Blechnum* in the British Isles	• Old oak woodlands – Bad (Improving)	To maintain or restore the favourable conservation condition of the Annex I habitat(s) and /or the Annex II species for which the SAC has been selected: • *Old sessile oak woods with Ilex and *Blechnum* in the British Isles [91A0][10]	• Land Take & Habitat Reduction

[9] Sourced from Glenasmole Valley Conservation Statement: http://www.npws.ie/media/npwsie/content/images/protectedsites/conservationstatement/CS001209.pdf

[10] There are no detailed Conservation Objectives for Glen of the Downs cSAC. Detailed Conservation Objectives for Old Oak Woodlands can be seen in the Slaney River Valley cSAC Conservation Objectives found at http://www.npws.ie/media/npwsie/content/images/protectedsites/conservationobjectives/CO000781.pdf

Table 1 Qualifying Interests, Conservation Status, Management Objectives, Conditions underpinning site integrity for relevant European sites

Site Name & Code	Approximate distance from Site	Qualifying Interests (*Priority Annex I Habitat for Conservation)	Current Conservation Status[1]	Conservation Management Objectives	Relevant Site Conditions
The Murrough Wetlands cSAC (002249)	*c.*12,600m	Annex I Habitats: • [1210] Annual vegetation of drift lines • [1220] Perennial vegetation of stony banks • [1330] Atlantic salt meadows (*Glauco-Puccinellietalia maritimae*) • [1410] Mediterranean salt meadows (*Juncetalia maritimi*) • [7210] * Calcareous fens with *Cladium mariscus* and species of the *Caricion*	• Drift lines – Inadequate (Declining) • Perennial vegetation of stony banks – Inadequate (Stable) • Atlantic salt meadows – Inadequate (Stable) • Mediterranean salt meadows – Inadequate (Stable) • *Cladium* Fen – Bad (Unknown)	Objective: To maintain or restore the favourable conservation condition of the Annex I habitat(s) and/or the Annex II species for which the SAC has been selected: • [1210] Annual vegetation of drift lines • [1220] Perennial vegetation of stony banks • [1330] Atlantic salt meadows (*Glauco-Puccinellietalia maritimae*) • [1410] Mediterranean salt meadows (*Juncetalia maritimi*) • [7210] * Calcareous fens with *Cladium mariscus* and species of the *Caricion davallianae*[11]	• Land drainage • Land use (e.g. building of an embankment and levelling of sandhills) • Land reclamation • Afforestation • Water quality • Agricultural intensification • Disturbance

[11] There are no detailed Conservation Objectives currently available for The Murrough Wetlands cSAC, however, more detail on Conservation Objectives for a similar site can be seen for the Slyne Head Peninsula cSAC at http://www.npws.ie/media/npwsie/content/images/protectedsites/conservationstatement/CS002074.pdf detailed conservation objectives for Calcareous Fen habitat [7210] can be sourced from http://www.npws.ie/media/npwsie/content/images/protectedsites/conservationobjectives/CO000268_V1.pdf (Galway Bay Complex SAC 000268)

Table 1 Qualifying Interests, Conservation Status, Management Objectives, Conditions underpinning site integrity for relevant European sites

Site Name & Code	Approximate distance from Site	Qualifying Interests (*Priority Annex I Habitat for Conservation)	Current Conservation Status[1]	Conservation Management Objectives	Relevant Site Conditions
		davallianae • [7230] Alkaline fens			
Special Protection Areas					
Dalkey Islands SPA (004172)	*c.*10,200m	• Roseate Tern (*Sterna dougallii*) [A192] • Common Tern (*Sterna hirundo*) [A193] • Arctic Tern (*Sterna paradisaea*) [A194]	• [A192] – Amber • [A193] – Amber • [A194] – Amber	To maintain or restore the favourable conservation condition of the bird species listed as Special Conservation Interests for this SPA: • The qualifying interests of the European site as listed in columns to the left	• Water quality including nutrient levels, water clarity, sediment levels • Foraging Habitat • Food supply • Appropriate Levels of disturbance • Water levels • Tidal currents • Erosion / deposition levels

Table 1 Qualifying Interests, Conservation Status, Management Objectives, Conditions underpinning site integrity for relevant European sites

Site Name & Code	Approximate distance from Site	Qualifying Interests (*Priority Annex I Habitat for Conservation)	Current Conservation Status[1]	Conservation Management Objectives	Relevant Site Conditions
					• Freshwater influx • Intertidal habitats • Air Quality
South Dublin Bay and River Tolka Estuary SPA (004024)	*c.*11,300m	• Light-bellied Brent Goose (*Branta bernicla hrota*) [A046] • Oystercatcher (*Haematopus ostralegus*) [A130] • Ringed Plover (*Charadrius hiaticula*) [A137] • Grey Plover (*Pluvialis squatarola*) [A140] • Knot (*Calidris canutus*) [A143] • Sanderling (*Calidris alba*) [A144] • Dunlin (*Calidris alpina*) [A149] • Bar-tailed Godwit (*Limosa lapponica*) [A157] • Redshank (*Tringa totanus*) [A162] • Black-headed Gull (*Larus ridibundus*) [A179]	• [A046] – Amber • [A130] – Amber • [A137] – Green • [A140] – Amber • [A143] – Red • [A144] – Green • [A149] – Red • [A157] – Amber • [A162] – Red • [A179] - Red • [A192] – Amber • [A193] – Amber • [A194] – Amber	To maintain or restore the favourable conservation condition of the bird species listed as Special Conservation Interests for this SPA: • The qualifying interests of the European site as listed in columns to the left	• Water quality including nutrient levels, water clarity, sediment levels • Foraging Habitat • Food supply • Appropriate Levels of disturbance • Water levels • Tidal currents • Erosion / deposition levels • Freshwater influx • Intertidal habitats • Air Quality

Table 1 Qualifying Interests, Conservation Status, Management Objectives, Conditions underpinning site integrity for relevant European sites

Site Name & Code	Approximate distance from Site	Qualifying Interests (*Priority Annex I Habitat for Conservation)	Current Conservation Status[1]	Conservation Management Objectives	Relevant Site Conditions
		• Roseate Tern (*Sterna dougallii*) [A192] • Common Tern (*Sterna hirundo*) [A193] • Arctic Tern (*Sterna paradisaea*) [A194] • Wetlands & Waterbirds [A999]			
Wicklow Mountains SPA (004040)	*c.*2,500m	• Merlin (*Falco columbarius*) [A098] • Peregrine (*Falco peregrinus*) [A103]	• [A098] – Amber • [A103] – Green	To maintain or restore the favourable conservation condition of the bird species listed as Special Conservation Interests for this SPA: • The qualifying interests of the European site as listed in columns to the left	• Appropriate levels of afforestation • Water quality • Foraging habitat • Breeding habitat • Food supply • Appropriate Levels of disturbance • Air Quality
The Murrough SPA (004186)	*c.*13,450m	• Red-throated Diver (*Gavia stellata*) [A001] • Greylag Goose (*Anser anser*) [A043] • Light-bellied Brent Goose (*Branta bernicla hrota*) [A046] • Wigeon (*Anas penelope*) [A050] • Teal (*Anas crecca*)	• [A001] – Amber • [A043] – Amber • [A046] – Amber • [A050] – Red • [A052] – Amber • [A179] – Red • [A184] – Red • [A195] – Amber	To maintain or restore the favourable conservation condition of the bird species (and wetland habitats associated with them) listed as Special Conservation Interests for this SPA: • The qualifying interests of the European site as listed in columns to the left	• Increased development in surrounding area • Increases in disturbance • Water quality • Agricultural intensification (and impacts upon water quality)

Table 1 Qualifying Interests, Conservation Status, Management Objectives, Conditions underpinning site integrity for relevant European sites

Site Name & Code	Approximate distance from Site	Qualifying Interests (*Priority Annex I Habitat for Conservation)	Current Conservation Status[1]	Conservation Management Objectives	Relevant Site Conditions
		[A052] • Black-headed Gull (*Chroicocephalus ridibundus*) [A179] • Herring Gull (*Larus argentatus*) [A184] • Little Tern (*Sterna albifrons*) [A195] • Wetlands & Waterbirds [A999]			

2.2.2 Protected and Notable Species

A number of data sets were consulted in order to obtain records of protected or notable species which have been noted in the vicinity of this site. These can be seen in Table 2, 3 and 4 below. It should be noted that such records are provided on an *ad hoc* basis and do not constitute a full and complete species list for the area.

Table 2 Protected and Notable Species recorded within 2km of these lands

Common Name	Scientific Name	Protection[12]	Red-Listing Status[13]	Number of Records, Approximate location and Date
National Parks and Wildlife Service Records (NPWS)				
Flora				
Rough Poppy	*Papaver hybridum*	FPO	Endangered	2, Bray Head, Date unknown
Spring Vetch	*Vicia lathyroides*	-	Rare	2, Bray Head, 1996
Yellow Archangel (noted within Knocksink Wood during the initial site visit 2014)	*Lamiastrum galeobdolon* subsp. *montanum*	-	Rare	3, Knocksink, 2005, 2007 and 2012
Fauna				
Amphibian				
Common frog	*Rana temporaria*	HDV, WA	Least concern	4, Enniskerry, 2003, 2006 & 2008
Mammal				
Irish hare	*Lepus timidus* subsp. *hibernicus*	HDV, WA	Least concern	4, Kilruddery and Powerscourt Estate, 1968 – 1991
Irish Stoat	*Mustela erminea* subsp. *hibernica*	WA	Least concern	3, Scalp, Kilruddery, Powerscourt Estate, 1968 and 1973
Pine marten	*Martes martes*	HDV, WA	Least concern	2, Powerscourt and Kilruddery, 1968
Pygmy shrew	*Sorex minutus*	WA	Least concern	1, Kilruddery, 1968
Red deer	*Cervus elaphus*	WA	Least concern	2, Powerscourt Estate, 1968 and

[12] HDII/IV/V = Habitats Directive Annexes II/IV/V; FPO = Flora Protection Order; WA = Wildlife Acts; BD I/II/III = Birds Directive Annex I/II/III

[13] Mammal Red-list from Marnell *et al.*, 2009. Birds from Birds of Conservation Concern in Ireland (Colhoun & Cummins 2013); Vascular Flora from the Irish Red Data Book 1
Vascular Plants (Curtis & McGough 2005); Fish and Amphibians from King et al., 2011; Non-Marine Molluscs from Byrne et.al, 2009.

Common Name	Scientific Name	Protection[12]	Red-Listing Status[13]	Number of Records, Approximate location and Date
				1991
Red squirrel	*Sciurus vulgaris*	WA	Near threatened	2, Kilruddery and Powerscourt Estate, 1968
Sika deer	*Cervus nippon*	WA	Not assessed	3, Powerscourt Kildruddery, 1968 and 1991
European hedgehog	*Erinaceus europaeus*	WA	Least concern	3, Enniskerry, Powerscourt and Kilruddery, 1968 – 1971
National Biodiversity Data Centre Records (NBDC)				
Flora				
Yellow Archangel (noted within Knocksink Wood during the initial site visit 2014)	*Lamiastrum galeobdolon* subsp. *Montanum*	-	Threatened, species listed as Vulnerable	2012
Mammals				
Soprano pipistrelle	*Pipistrellus pygmaeus*	HDV, WA	Least concern	2010
Daubenton's Bat	*Myotis Daubentonii*	HDV, WA	Least concern	2009
Brown Long-eared Bat	*Plecotus auritus*	HDIV, WA	Least concern	2009
Common Pipistrelle	*Pipistrellus pipistrellus*	HDIV, WA	Least concern	2009
Leisler's Bat	*Nyctalus leisleri*	HDIV, WA	Near Threatened	2009
Natterer's Bat	*Myotis nattereri*	HDIV, WA	Least concern	2009
Whiskered Bat	*Myotis mystacinus*	HDIV, WA	Least concern	2009
European Otter	*Lutra lutra*	HDII, HDIV, WA	Near Threatened	2011
Red Squirrel	*Scuirus vulgaris*	WA	Near Threatened	2012
Badger	*Meles meles*	WA	Least concern	2010
Irish Stoat	*Mustela erminea* subsp. *hibernica)*	WA	Least concern	2012
Red Listed Birds* *This list is based on NBDC 10km Grid Square records only and includes historic records within the National Grid Square O21. Detailed lists of BoCCI species within close proximity to the site can be obtained from Bird Watch Ireland.*				
Grey partridge (historic record) – currently only resident in Co. Offaly.	*Perdix perdix*	-	Birds of Conservation Concern, Red List	1972 Bird Atlas Record
Quail (historic record) – currently only recorded as a rare summer visitor and passage migrant.	*Coturnix coturnix*	-	Birds of Conservation Concern, Red List	1991 Bird Atlas Record
Corncrake (historic record) – Currently only recorded as a summer visitor from April to September.	*Crex crex*	-	Birds of Conservation Concern, Red List	1972 Bird Atlas Record

Common Name	Scientific Name	Protection[12]	Red-Listing Status[13]	Number of Records, Approximate location and Date
Lapwing – within 10km Grid square O21	*Vanellus vanellus*	-	Birds of Conservation Concern, Red List	1991 Bird Atlas Record
Woodcock – within 10km Grid square O21	*Scolopax rusticola*	-	Birds of Conservation Concern, Red List	1991 Bird Atlas Record
Curlew – within 10km Grid square O21	*Numenius arquata*	-	Birds of Conservation Concern, Red List	1991 Bird Atlas Record
Black-headed gull – within 10km Grid square O21	*Chroicocephalus ridibundus*	-	Birds of Conservation Concern, Red List	1991 Bird Atlas Record
Herring gull – within 10km Grid square O21	*Larus argentatus*	-	Birds of Conservation Concern, Red List	1991 Bird Atlas Record
Barn owl – within 10km Grid square O21	*Tyto alba*	-	Birds of Conservation Concern, Red List	1991 Bird Atlas Record
Whinchat – within 10km Grid square O21	*Saxicola rubetra*	-	Birds of Conservation Concern, Red List	1972 Bird Atlas Record
Yellowhammer – within 10km Grid square O21	*Emberiza citrinella*	-	Birds of Conservation Concern, Red List	1991 Bird Atlas Record
Insects				
Mining bee	*Andrena (Cnemidandrena) denticulate*	-	Near Threatened	2008
Panzer's Nomad bee	*Nomada panzeri*	-	Near Threatened	2008
Fucate Mining Bee	*Andrena (Andrena) fucata*	-	Near Threatened	2008
Andrena bee	*Andrena (Cnemidandrena) fuscipes*	-	Vulnerable	2005

Table 3 – Protected and Notable Species associated specifically with Knocksink Woodland according to NPWS map-viewer

Table 3 Records of Protected, Rare and other Notable Flora and Fauna Species relating specifically to Knocksink cSAC/pNHA (NPWS Map Viewer)			
Common Name	**Scientific Name**	**Protection[14]**	**Red-Listing Status[15]**
Flora			
Bird's Nest Orchid	*Neottia nidus-avis*	-	Rare
Blue Fleabane	*Erigeron acer*	-	Vulnerable
Ivy Broomrape	*Orobanche hederae*	-	Notable
Ivy-leaved Bellflower	*Wahlenbergia hederacea*	-	Rare
Yellow archangel	*Lamiastrum galeobdolon ssp. montanum*	-	Rare
Fauna			
Amphibian			
Common frog	*Rana temporaria*	HDV, WA	Least concern
Invertebrates - Hoverflies			
-	*Brachyopa insensilis*	-	Rare
-	*Criorhina ranunculi*	-	Notable
-	*Heringia heringi*	-	Notable
Speckled bush-cricket	*Leptophyes punctatissima*	-	Notable
-	*Sphegina elegans*	-	Notable
Invertebrates - Diptera			
-	*Chyliza nova*	-	Notable
-	*Oxycera falleni*	-	Notable
-	*Pteromicra angustipennis*	-	Notable
-	*Rhaphium riparium*	-	Notable
-	*Systenus leucurus*	-	Notable
-	*Systenus scholtzi*	-	
-	*Tetanocera sylvatica*	-	Notable
Invertebrates - Hymenoptera			
Golden Cheilosia	*Cheilosia chrysocoma*	-	Notable
-	*Tiphia minuta*	-	Notable
Mammals			

[14] HDII/IV/V = Habitats Directive Annexes II/IV/V; FPO = Flora Protection Order; WA = Wildlife Acts; BD I/II/III = Birds Directive Annex I/II/III
[15] Mammal Red-list from Marnell et al., 2009. Birds from Birds of Conservation Concern in Ireland (Colhoun & Cummins 2013); Vascular Flora from the Irish Red Data Book 1 Vascular Plants (Curtis & McGough 2005); Fish and Amphibians from King et al., 2011; Non-Marine Molluscs from Byrne et.al, 2009.

Table 3 Records of Protected, Rare and other Notable Flora and Fauna Species relating specifically to Knocksink cSAC/pNHA (NPWS Map Viewer)			
Common Name	**Scientific Name**	**Protection[14]**	**Red-Listing Status[15]**
Badger	*Meles meles*	WA	Least concern
European otter	*Lutra lutra*	HDII, HDIV, WA	Near threatened
Red Squirrel	*Sciurus vulgaris*	WA	Near threatened

Table 4 Bat Conservation Ireland Records	
Common Name	**Scientific Name**
The following bats are known to roost within 10km of the site (the closest BCI record ~4.5km east of the Kilgarran site)	
Brown Long-eared Bat	*Plecotus auritus*
Natterer's Bat	*Myotis natterreri*
Leisler's Bat	*Nyctalus leisleri*
Common pipistrelle Bat	*Pipistrellus pipistrellus*
Soprano pipistrelle Bat	*Pipistrellus pygmaeus*
Unidentified *Myotis* Species	*Myotis spp.*

2.3 FIELD SURVEY & ASSESSMENT

Habitat and Protected Species Survey

An initial walkover site visit was undertaken on 2nd April 2014. The site was then revisited on 11th April 2014 to undertake a detailed ecological constraints assessment. The habitats were classified and the site was also surveyed for terrestrial mammal species such as badgers and habitats were assessed for their potential to support bats according to the survey guidance outlined above. Where noted, bird species and field signs (such as nests or pellets) were also recorded.

The proposed development site was surveyed using the methodology outlined in *Best Practice Guidance for Habitat Survey and Mapping* (Heritage Council, 2011). The principal habitats present within the site were identified and classified using *A Guide to Habitats in Ireland* (Fossitt, 2000), and dominant and rare/notable species were recorded. Plant nomenclature follows *New Flora of the British Isles Third Edition* (Stace, 2010). A map has been provided in Appendix A to highlight areas of ecological sensitivity and a habitat map is provided in Appendix C.

Ecological value and significance of ecological features follow the *Guidelines for Ecological Impact Assessment in the United Kingdom* (IEEM, 2006) and the *Guidelines for assessment of Ecological Impacts of National Road Schemes* (NRA, 2009). Relevant extracts from these can be seen in Appendix D of this report.

During the site surveys, potential constraints were identified. Particular attention was given to the presence of a petrifying spring (Spring 5) with tufa formation existing on the site (at approximate grid reference: O 21753, 17492) as well as adjacent petrifying springs located within the Knocksink Woods cSAC (Springs 7 & 8). This habitat is of considerable ecological and hydrogeological interest and is listed on Annex I (priority habitat) of the EU Habitats Directive. Tufa springs occur where lime-rich water emerges from the ground and deposits a calcium rich coating upon the plants and ground surface.

The priority Annex I habitat (EU code 91EO) Alluvial Forest with Alder (*Alnus glutinosa)* and Ash (*Fraxinus excelsior)* is within Knocksink Wood but lies outside of the AA1 zone.

Knocksink Wood cSAC is considered to support one of the richest invertebrate assemblages in Ireland. As no development will take place within the woodland, detailed invertebrate surveys were not carried out as part of this assessment.

Bat survey

A dusk bat activity survey was carried out on 29th July 2014 during the optimum bat survey period. The aim of this survey was to provide an early indication of the species using this site and to gauge where the highest levels of activity might occur. This involved a dusk and post-emergence activity survey, using a Petterson D240X bat detector. Recordings were made on a Zoom Handy Recorder. The surveyor monitored the bat activity at the derelict cottage (and mature trees adjacent) for the first part of the survey to assess their potential to support roosting bats. Following darkness a walked transect was conducted around the entire AAP site to gain further information regarding potential bat foraging and commuting areas.

Two static bat detectors (Anabat) were located adjacent to the derelict cottage (small area marked BL3 on habitat map in appendix C) & scrub (WS1), and another at a mature ash tree to the north of the AAP site. These were left on site to record for three nights to provide additional species records.

Detailed Botanical Survey

The site was re-visited by Dr. Joanne Denyer on 4th July 2014 to undertake a detailed botanical assessment. This survey included a botanical assessment of the springs within the site and immediately adjacent to assess their current status as petrifying springs (Annex I priority habitat: 'Petrifying springs with tufa formation'). In addition, an assessment was carried out of the immediate strip of woodland that bounds the AAP site within the Knocksink cSAC for its potential to support the Annex I priority woodland habitat for which the cSAC is designated ('Alluvial forests with *Alnus glutinosa* and *Fraxinus excelsior*'). The grasslands were also assessed to confirm their habitat classification and value.

2.4 LIMITATIONS

These surveys provide a snap shot of the ecology of this site within a specific time during the survey season. The assessments were undertaken during the optimum survey period for all habitats within the AAP site (excluding the woodland survey for which a spring flora survey was not undertaken) and can confirm the likely presence or absence of protected or notable species on the site. However, species which were not present on site due to the time of year, or which were not present on the day of survey, could have been missed. Many of the fields on site were heavily grazed which may lead to certain flora being overlooked. The surveys undertaken were sufficient for identifying and evaluating all habitats and ecological features of value within the AA1 zone. In certain cases further surveys have been recommended to enable the design of appropriate mitigation measures.

The data for species records held by records centres and statutory bodies (such as National Parks and Wildlife Service) is often provided on an *ad hoc* basis by recorders. These records can only provide an indication of what species might be found in an area, however, they do not constitute full and complete species lists. Absence of certain species from these sources do not confirm absence of species in the area.

3 RESULTS

3.1 FIELD SURVEY RESULTS

3.1.1 Habitats and Flora

Habitats within the AAP include Oak-ash-hazel woodland (WN2), Scrub (WS1), Dry calcareous and neutral grassland showing signs of improvement (GSi1), Amenity grassland (GA2), and Improved agricultural grassland (GA1). There is one derelict cottage (BL3) on the site which is surrounded by scrub (with the potential to support roosting bats), and the majority of boundaries are comprised of Hedgerows (WL1) with some mature trees, some of which are deemed to be category 1 potential bat roost trees according to guidelines (Hundt, L. 2012).

Notably, a Petrifying spring (FP1) with tufa formation (a Habitats Directive priority Annex I habitat) was noted within the AAP site in one of the fields (Spring 5). This spring is considered to be an example of the Annex I priority habitat 'Petrifying springs with tufa formation'. However, the tufa deposits are localised and species richness was low with few typical tufa species. It is therefore not considered to be a good example of a Petrifying spring and is considered of County ecological importance only (as opposed to national or international). Also of note is the presence of a moss species at this spring which is a new Vice County record for County Wicklow. However, this species is listed as 'Least Concern' on the Red List (Lockhart, *et al.* 2012).

Non-native invasive species present within the AAP site include Cherry laurel *Prunus laurocerus*, Montbretia *Crocosmia x crocosmiiflora* and three-cornered leek *Allium triquetrum*.

Ecological areas of value which lie outside of the AAP site but which could be impacted by development at this site include, the two Annex I Tufa springs within the southern boundary of Knocksink Wood cSAC immediately adjacent to the site and the area of marsh (GM1) which lies north-west of the AAP site and was classified as being of County ecological importance as it supports a diverse flora. Annex I habitat Alluvial forests with *Alnus glutinosa* and *Fraxinus excelsior'* (WN4), for which the cSAC is also designated can be found outside of the AAP site and is buffered by a wide swathe of oak-ash-hazel woodland which may offer it some protection from adjacent development of the AAP site.

Table 5 below details the habitats and flora that have been identified within the AAP site (according to Fossitt, 2000). This table has been adapted using the botanical report provided by Dr. Joanne Denyer. For detailed habitat descriptions please refer to this Botanical Report in Appendix B.

Table 5 Habitats and Flora within the AAP Site

Habitat	Description	Ecological Value
Spring 1	This spring is located on the northern boundary of the site. It is associated with a drinking trough and flows west to east down a slight slope. It is heavily grazed and poached with little diversity. It graded to a grassy channel down the slope to the east, losing flow and becoming dry. There were no signs of tufa formation or bryophytes typical of tufa springs. This spring is therefore **not considered** an example of the **Annex I priority habitat** 'Petrifying springs with tufa formation'.	It is valued as being of **Local (higher value)** ecological importance.
Spring 2	This spring is located at the entrance of the eastern field, to the east of the gateway. It is a small spring and flows south to north. There were some signs of poaching by the ponies that graze this field. There were no tufa deposits or other typical tufa bryophytes. This spring is therefore **not considered** an example of the **Annex I priority habitat** 'Petrifying springs with tufa formation'.	It is valued as being of **Local (higher value)** ecological importance.
Spring 3 & 4	These two springs are located to the south of Spring 2 and flow west to east down a small bank. There was no tufa or typical tufa species present and therefore these spring are **not considered** examples of the **Annex I priority habitat** 'Petrifying springs with tufa formation'.	They are valued as being of **Local (higher value)** ecological importance.
Spring 5	Located in the eastern field of the survey area and flows south to north down a slight slope. There was some localised tufa formation on *Cratoneuron filicinum*. Therefore this **is considered** to be an example of the **Annex I priority habitat** 'Petrifying springs with tufa formation'. However, the tufa deposits are localised and species richness low with few typical tufa species. It is therefore not considered to be a good example of a Petrifying spring. Of note is the presence of a moss species *Leptobryum pyriforme* at this spring which is a new Vice County record for County Wicklow. However, this species is listed as being of 'Least Concern' on the Irish Red List (Lockhart, *et al.* 2012).	This spring is considered to be of County ecological importance.
'Spring' 6	This area is an overflow from a septic tank (and according to the hydrogeological survey results this is unlikely to be caused by a spring as first thought might be the case). It is located in the eastern field and flows south to north, down a moderate slope. There were no species typical of tufa springs. It is **not considered** an example of the **Annex I priority habitat** 'Petrifying springs with tufa formation'. This overflow has the potential to negatively impact upon the tufa springs in Knocksink Wood as such works have been carried out to fix this issue and there is no longer a flow from this septic tank.	This is not a spring and is valued as being of Local (lower value) ecological importance.
Spring 7	Located within the woodland area to the south of the AA1 zoned lands and is within Knocksink Wood cSAC. The spring flows from south to north, down a relatively steep woodland bank. Tufa formation is frequent throughout the spring, although there are no large deposits. The spring is a typical woodland example of the **Annex I priority habitat** 'Petrifying springs with tufa formation'.	This spring is located within a cSAC, for which Petrifying springs with tufa formation are a qualifying interest. It is valued as being of International

		ecological importance.
Spring 8	Habitat maps supplied by National Parks and Wildlife Service (NPWS) show a second tufa spring present in the woodland area to the south of the survey site (east of spring 7). This could not be located despite several surveys in this area. The spring could be hidden by dense undergrowth, however there was no sign of spring outflow onto the path in this area and it may be that the spring is dry in springtime and in summer.	Likely International ecological importance.
Oak-ash-hazel woodland (WN2)	The area of woodland immediately north of the zoned lands, between the zoned lands and the river, is within the AAP site. Although outside of the zoned lands, this woodland is within the cSAC and so was surveyed to assess the woodland habitats present. The main woodland type in this area is oak-ash-hazel woodland (WN2). Due to the survey timing (July), some early flowering vascular plant species may have been overlooked. However, this will not change the woodland classification and Annex I habitat assessment. The Red Data Book species Yellow Archangel (*Lamiastrum galeobdolon* ssp. *montanum),* was recorded in the cSAC during the April survey (by Scott Cawley). This woodland type does **not correspond** to the Annex I priority habitat 'Alluvial forests with *Alnus glutinosa* and *Fraxinus excelsior*'.	This is an example of diverse semi-natural woodland within a cSAC, and it is considered to be of County to National ecological importance. A spring flora survey would be required to confirm its ecological value.
GA1 – Improved agricultural grassland	This is a species-poor grassland type that has been improved by fertiliser and/or grazing.	This is of Local (lower value) ecological importance.
GSi1 – Improved dry calcareous and neutral grassland	These areas represent a transitional stage from GS1 to GA1 (improved grassland).	These fields are of **Local (higher value)** ecological importance.
GA2 – Amenity grassland	There are two fields of improved amenity grassland (GA2), a larger field which is intensively mown, and one smaller field (less intensively used) to the west of this. These support similar species to the improved agricultural grassland, but with lower diversity.	This is of Local (lower value) ecological importance.
WL1 - Hedgerows	These were the most common boundary feature across the site ranging from low value (defunct, with low species diversity and a high percentage of gaps) to those of moderate value (with greater species diversity, mature standard trees and parallel streams etc.) – a full explanation of this criteria can be seen in Appendix E. The dominant hedgerow species included Hawthorn *(Crataegus monogyna)*, Gorse *(Ulex europaeus)*, Goat willow *(Salix caprea)* and Holly *(Ilex aquifolium)*.	The native hedgerows are of Local Importance (Higher Value)
WL2 - Treeline	There are mature broadleaved treelines which are dominated by species such as Ash *(Fraxinus excelsior)*, Sycamore *(Acer pseudoplatanus)*, Oak *(Quercus sp.)* and Beech *(Fagus sylvatica)*. Some of these mature trees have varying degrees of suitability for bat species to roost. Species poor treelines on site	The native treeline is valued at Local Importance (Higher Value)

	included Leyland cypress *(Cupressocyparis leylandii)*. There are mature trees scattered across the site (particularly ash and sycamore) which have been identified as being Category 1 trees which might support roosting bats.	
WS1 – Scrub	An area of dense scrub exists which bounds the cSAC woodland. This habitat provides connectivity to the cSAC and acts as an area of cover for wildlife within the AAP site.	This habitat is valued as being of Local (Higher value)
BL3 - Building	A derelict house exists in the center of the AAP site adjacent to the road. This provides suitable habitat for roosting bats and has good connectivity to the rest of the site through hedgerows and scrub. See also results of bat survey below.	This habitat is deemed to be of Local Importance (Higher Value)

There is also ecologically valuable habitat which lies outside of the AAP site which has been addressed in this assessment. Due to its proximity to site, the Annex 1 priority habitat 'Alluvial forests with *Alnus glutinosa* and *Fraxinus Excelsior*' (WN4) has been considered, although this area of woodland is buffered to a degree from the AAP site by a band of scrub (WS1) and the Oak-Ash-Hazel woodland (WN2). The WN4 habitat is deemed to be of **International** importance.

In addition, there is an area of wet grassland (GS4) and marsh (GM1) to the north west of this site which has been considered in this assessment. The GM1 marsh is considered to be of **County** ecological importance.

3.1.2 Fauna

Confirmed evidence and potentially suitable habitat for protected species are described below.

Table 6 Habitats and Flora at the AAP Site

Species	Description
Protected Mammals[16]	
Badger *Meles meles*	No badger setts were noted within the AA1 Zone. However, mammal paths were found on site (some of which presented field signs of badgers such as hair caught in barbed wire). Badgers are known to exist within Knocksink Wood cSAC/pNHA and forage in the area.
Bats	Numerous mature trees on the AAP site were identified as supporting suitable features for roosting bats. These trees are scattered throughout the AAP site and within Knocksink Wood. Potential bat roost features also include buildings on site and in the surrounding area. Common Pipistrelle and Leisler's bats were recorded on this site during the bat survey. Further details of the bat survey results are shown below.

[16] All these species and their breeding/resting places are protected under the Wildlife Act while bats and otter are further protected as European Protected Species under the EU Habitats Directive

Otter *Lutra lutra*	The Glencullen River runs from scrubland into Knocksink Wood in an easterly direction to the north of this site (this river lies outside of the AA1 zone). There is potential for this habitat to support Otters and their holts.
Small mammals including Hedgehog *Erinaceus europaeus*, Pygmy Shrew *Sorex minutus*, and Irish stoat *Mustela ermine*.	None noted during surveys but are likely to occur in within the site, and some of these species have been recorded in the local area and arise within NPWS records.
Protected Birds / Birds of Conservation concern (BoCCI) (Colhoun & Cummins, 2013)[17]	
Kingfisher *Alcedo atthis* (protected species)	Potential to occur along the Glencullen River habitat. Although there are currently no records available for this species in the area, it may be under recorded. This species will not be impacted by the AAP as no suitable habitat falls within the AA1 zone.
Buzzard (*Buteo buteo*) and Sparrow hawk *(Accipiter nisus)*	Have been seen in the area (by NPWS DCO) and a bird of prey pellet (species unconfirmed) was found within the AAP site during the initial site visit.
Other species	There is some low potential for red listed bird species such as Yellowhammer to be supported within the AA1 zone for feeding, breeding and resting sites.
Protected Amphibians	
Common Frog *Rana temporaria*	Likely to breed in ponds within Knocksink Wood.
Smooth Newt *Triturus vulgaris*	Has not been recorded but is likely to exist within Knocksink Wood habitats (this species breeds within still ditches or ponds).
Invertebrates	As the AAP lands zoned for development (AA1 zone) lie outside of Knocksink Wood, detailed invertebrate surveys were not carried out. NPWS have recorded a diverse invertebrate assemblage and included some rare species associated with unique habitats within this woodland.

Bat Survey

Two species of bat were recorded during the manual activity survey. Three Leisler's bats were first noted at 21:35 beside the old derelict cottage (see Figure 3). This building is heavily overgrown with bramble and ivy scrub, and as such it was not possible to carry out a building inspection. Due to their emergence very early on in the survey, it is believed that the Leisler's bats (*Nyctalus leisleri*) may have come from the building or the mature trees adjacent.

[17] The Birds of Conservation Concern in Ireland list (Colhoun & Cummins 2013) assigns All-Ireland populations of resident/breeding/migratory bird species with Green (0-25% population declines), Amber (25-49% declines) or Red status (>50%% declines).

Figure 3: Derelict Cottage Completely Surrounded by Scrub and Mature Trees



Common pipistrelle bat (*Pipistrellus pipistrellus*) were recorded at 21:50 in the same location but not seen. This species was heard for a length of time after dark and is likely to be commuting and foraging in the vicinity.

Throughout the survey Leisler's bats were commuting, foraging, social calling and showing social behaviour in the vicinity of the derelict cottage and mature trees.

Figure 3: Bat Activity and Location of Anabat Detectors



● = Location of Anabat Static bat detectors (28th – 30th July 2014) → = Commuting Leisler bat's ↔ Forraging Lesiler bats (thought to potentially be roosting in this location possibly in the derelict & overgrown cottage, or the mature trees surrounding it).

*Note Common pipistrelle bats were also recorded adjacent to the cottage (but not seen) during dusk survey. Soprano pipistrelle bat were an additional species recorded on the static Anabat detectors.

The Anabat detectors also recorded one pass of Soprano pipistrelle *(Pipistrellus pygmaeus)* also using this site.

Bats were recorded using the site across all three nights of the Anabat static detector survey. The highest level of activity was recorded in the vicinity of the derelict cottage and mature trees in this area (Leisler's, Common pipistrelle and Soprano pipistrelle bats were all recorded on the Anabat in this location), however Common pipistrelle were also recorded to the north east of the site at the second Anabat location. There is potential for all three of these species to find suitable roosting habitat within the AA1 zone (particularly within suitable mature trees and the derelict cottage). It is also anticipated that due to the large area of woodland habitat at this site, other species such as Brown long-eared bats and *myotis* bat species (which are both recorded by BCI as occurring in the surrounding area) are likely to be found at this site following further detailed survey work.

4 ECOLOGICAL ASSESSMENT

4.1 KEY CONSTRAINTS

A map showing areas of ecological sensitivity is provided in Appendix A. This map indicates areas where there are no/few ecological constraints to development as well as those that are more vulnerable to significant impacts.

- Lands of high ecological value, which are County importance or higher (red areas) are of high sensitivity (e.g. Annex I habitats such as Petrifying Springs and Alluvial woodland habitat) and during the early development of the plan it was recommended that these areas should preferably be retained and protected from inappropriate development. It was also identified in the early stages of the plan development that in these locations there may be the opportunity for ecological enhancement. It was recommended that development in these areas should be avoided, minimised or where unavoidable mitigated / managed in such a way that the AAP will not result in significant ecological impacts.
- For lands which are of high local ecological value (amber areas) it was recommended during the early stages of the plan development that these areas should be incorporated into any appropriate development design. It was identified that these areas may require precautions and / or further investigation to be undertaken prior to any development taking place (*e.g.* detailed bat surveys) and that development in these areas may necessitate mitigation measures in order to avoid significant ecological impacts (this work should be based upon detailed design at planning application stage). It was recommended that vegetation in these areas be retained as much as possible and integrated into the plan where feasible.
- For lands which are of low or negligible ecological value it was identified that these would be unlikely to pose any constraint to development. It was recommended during the early stages of the plan development that development in these areas is unlikely to require any special or significant mitigation measures.

An assessment undertaken by the Woodland Trust (Corney et al. 2008) details the types of impacts that are imposed upon woodland habitats when development is located close by. These include: activity visible from within the wood, causing flushing or avoidance of wildlife from within the woodland; acts of vandalism; animal avoidance; animal mortality; changes to soil structure; disrupted hydrological function; light pollution; noise pollution; predation by pets or large-bodied

birds; removal of dead wood or plants; the dumping of rubbish and garden waste; and, vegetation trampling.

In order to fully mitigate for future impacts at this site, further survey work will be required at the detailed design stages as has been identified in Table 7 below and in the recommendations section of this report. It should be noted that a number of these surveys are seasonally-dependent, and failing to carry out these surveys at the correct time of year can lead to significant delays in both receiving permission from the local authority and undertaking construction works (e.g. bat and breeding bird surveys). Table 7 below illustrates further ecological surveys which may be required and indicates the optimum time periods for these surveys.

Table 7: Specification for further surveys

Survey	Justification for surveys	Survey methodology	Seasonal Window (inclusive)
Detailed bat surveys – Particularly important if impacting upon derelict cottage, mature trees, hedgerows or woodland at this site.	**Protected Species:** Following a preliminary bat survey at this site the mature trees in the vicinity of the derelict cottage (and the cottage itself) are likely to be used as roosting sites by Leisler's and possibly Common pipistrelle bats. Foraging and commuting activity was noted along hedgerows at this site and adjacent to the woodland cSAC. In addition bats may use other linear features such as streams/rivers etc. as commuting routes and foraging areas.	Internal/external inspection of buildings and dusk/dawn activity surveys (including transects) across this site prior to any works commencing on site. *Note: For a building inspection survey it would be necessary to remove some scrub vegetation in order to access the cottage which is heavily overgrown. This should preferably be cut during September to February (outside of nesting bird season).*	May – August, minimum of 6 weeks prior to works commencing and during suitable weather conditions. It should be noted that a derogation licence would need to be sought from NPWS in order to remove a known bat roost.
Breeding Bird Survey – Necessary if removing scrub, trees or hedgerows at this site (during March 1st to August 31st; the active breeding season).	**Protected Species: Only required if development works would have the potential to disturb breeding sites.** Recommend that where possible, vegetation clearance is undertaken outside of the nesting bird season (carryout vegetation clearance/works in September to February) so as to avoid the risk of damaging nests, eggs or killing/injuring breeding birds.	If vegetation clearance cannot avoid the breeding season then a nesting bird check should be undertaken between March and August within all suitable vegetation to pinpoint the nest location and to devise appropriate mitigation, including the potential application for a NPWS licence if necessary.	March – August
Badger	**Protected Species:** Evidence of badgers has been found in the wider area. These are highly mobile species and should be considered during future development of this site.	A badger survey should be conducted well in advance of any planning application submissions at this site. In the unlikely event that a badger sett was found on site, a derogation licence may be required from NPWS.	All year (optimum times: Spring or late Autumn/Winter.)
NOTE: Other protected & notable species **Otter, Kingfisher, Fish and Invertebrates** As the AA1 Zone for development will not directly impact upon river habitat and does not currently impact upon resting sites for Otter, these species do not require further survey. In addition, no development will occur within the Knocksink Wood cSAC. If the AA1 zone is extended in future, or if development occurs outside of this zone or within the Glencullen River or its tributaries (including drainage works), further surveys would be required to properly consider the impacts upon species which are likely to exist in the wider area.			

4.2 ECOLOGICALLY SENSITIVE DESIGN OF THE AAP

The design of this Area Action Plan has given consideration to the ecological sensitivity of this site. Following the initial ecological constraints assessment of the AA1 zone, the following positives have been reached:

- Development within the AAP has largely been zoned within areas of lower ecological sensitivity;
- A buffer zone of green open space (known as 'East Park' in the AAP) will be maintained alongside the margin of Knocksink Wood SAC. This area was identified as being of high sensitivity in the constraints assessment due to its proximity to the cSAC boundary and the presence and location of Tufa springs (located near this area at Springs 5, 7 & 8). This habitat will not undergo development, and any landscaping here will use native species in a natural assemblage (in keeping with the existing habitat) and will follow the advice of an ecologist. As such, this buffer will act as a protective band of vegetation immediately adjacent to the cSAC;
- An overflowing septic tank (at 'Spring' 6) was identified during surveys. This was flowing towards the cSAC. This septic tank has now been cleared out and all septic tanks within the AA1 zone will be decommissioned and services will be joined to the mains sewerage system of the town. This should have positive implications for the Glencullen River which runs through the cSAC and is currently 'at risk of not achieving good status' according to the EPA water quality assessments;
- Sustainable Urban Drainage (SUDs) will be utilised within further developments of this site. This will help to improve water quality in the area;
- Hedgerows and mature trees of ecological value have been identified within the AA1 zone and these will be retained within the AAP design. As such, the majority of breeding bird habitat will be retained across the site; and,
- New areas of planting have been outlined within the AAP, these include the planting of trees and the soft landscaping of green open space. Such planting will help to maintain green infrastructure within the AA1 zone. It has been recommended that native planting is used to create more naturalised areas of habitat which will encourage biodiversity across the AAP area.

4.3 KEY IMPACTS OF THE AAP

The key ecological impacts that this AAP may have are identified as follows:

- Hydrogeological impacts – For full details of this please refer to the Hydrogeological report conducted by Dr. Les Brown, September 2014 which is appended to the Appropriate Assessment report for this AAP. Such impacts have the potential to significantly affect the tufa springs and associated *Cratoneurion* formation and plant assemblage;
- Habitat loss and fragmentation – there will be some loss of hedgerows (of lower value), scrub and standard trees;
- Lighting impacts – development at this site has the potential to increase the lux levels and to disturb or deter wildlife as a result (this is a particularly important consideration in relation to bats);
- Drainage – this has the potential to impact upon the water quality and flow of watercourses/water bodies which it effects. Indirect impacts to groundwater, surface water flow and local water courses could occur;
- Increased visitor pressure on the cSAC – it is recognised that building residential and commercial properties within the AA1 zone will inevitably lead to increases in the number of people using Knocksink Wood cSAC for recreational and amenity purposes, as well as potentially leading to further anti-social behaviour in the cSAC; and,
- Impacts upon protected and notable species – as discussed in Section 4.1 the above impacts all have the potential to directly affect species such as bats, breeding birds and to a lesser degree, badgers.

5 RECOMMENDATIONS

The objectives of the Kilgarran Hill AAP that specifically relate to ecology have been designed to reflect the results of this report. Due to the potential impacts outlined above the following recommendations have also been made in relation to the AA1 zone which was surveyed.

1. As the possibility of a significant effect on Knocksink Woods cSAC has been established, an Appropriate Assessment, in accordance with Article 6 of the Habitats Directive as transposed in Ireland, shall be required for all plans and projects proposed within the 'inner catchment zone' (as indicated on the Ecological Sensitivity Map in Appendix A) which involve any of the following: interception or interaction with groundwater; dewatering or abstraction of

groundwater; discharges to groundwater; or diversion, impeding, dilution or reduction of groundwater flow or quality.

2. Any works proposed within the 'inner zone of catchment' area for the tufa springs, in particular the provision of buildings, utilities, roads and/or pathways and other works that break ground shall, prior to obtaining consent and/or commencing works, provide evidence in the form of a detailed impact assessment that there will be no significant impact on the hydrogeological, ecological and other physical conditions on which these springs rely. This detailed impact assessment will determine any potential changes in the water quality and water balance (recharge, storage and discharge) of the cSAC tufa springs and will examine the detailed design and assess impacts of subsurface works on groundwater flow and the risk of potential pollutants on receiving waters. Collection of hydrogeological data may be required to demonstrate this. Detailed proposals for ensuring surface water recharge, in a suitable manner and location to ensure the continued supply of calcium rich water to the springs, shall be provided for any works subject to this objective.
3. In order to ensure that the implementation of the Area Action Plan will avoid significant ecological effects, including on the Knocksink cSAC, all proposals for drainage and foul water infrastructure, treatment and disposal will be subject to a separate ecological assessment and to the requirements of Article 6 of the Habitats Directive as transposed in Ireland (i.e. subject to screening for Appropriate Assessment and full Appropriate Assessment if necessary). For any proposals for discharges to the Glencullen River, these assessments will pay particular attention to any impacts on the Knocksink Woods cSAC habitats including woodlands and the Glencullen River and to protected species it supports such as Kingfisher, Otter, fish and invertebrate species. For any proposals involving works within the Knocksink Woods cSAC, these assessments will pay particular attention to any temporary or permanent impacts to habitats, including in particular to the habitat types for which the cSAC has been designated. This issue will be addressed in more detail within the Appropriate Assessment report for the AAP.
4. In order to ensure that the Area Action Plan will avoid significant effects on the Knocksink cSAC through increased visitor use of Knocksink Wood, signage and educational information regarding the cSAC will be provided within the AAP lands including encouragement for access to the woods only through official entrances and pathways. All non-official pathways into Knocksink cSAC from the AA1 zone will be closed (where they are not existing public rights of way) and the public will be encouraged to utilise the existing official entrances to the wood (through the appropriate positioning of paths, gates and sign posts around the

site). Educational signs and litter bins will be installed and managed across the site so as to encourage the appropriate use of open space within the AAP and Knocksink Wood cSAC and to discourage fly tipping.

5. In order to mitigate future development at this site and to ensure the protection of the cSAC tufa springs and other ecologically valuable habitat which has been identified across the site, the following measures should be taken:
    a. The derelict cottage will only be demolished following further detailed bat surveys and appropriate mitigation where necessary. If required, where a bat roost is found to be impacted, a derogation licence will be sought from NPWS and the appropriate mitigation would be carried out to negate the impacts.
    b. Mature trees adjacent to the derelict cottage and important hedgerows will be maintained, as will other mature tree lines/hedgerows e.g. those connecting into the west of Knocksink Wood cSAC.
    c. Where possible, vegetation clearance shall be undertaken outside of the period March 1st to August 31st (the active breeding season) so as to avoid damaging nests, eggs or killing/injuring breeding birds. Where this seasonal restriction cannot be observed, a breeding bird survey shall be undertaken immediately prior to works taking place, to identify the presence of breeding birds and to devise appropriate mitigation.
    d. During construction tree root protection areas shall be in place and follow standard best practice advice for all hedgerows and mature trees to be retained.
    e. Developments adjacent to the Knocksink Wood cSAC will require an invasive species survey to determine the presence and extent of invasive species and appropriate management and control measures will be recommended based on these findings to ensure that works in these areas do not result in the spread of invasive species which would be an offence under the European Communities (Birds and Natural Habitats) Regulations 2011.
    f. Landscaping and planting proposed for new developments shall not include any of the non-native invasive plant species listed on Schedule 3 of the European Communities (Birds and Natural Habitats) Regulations 2011, in particular the following species; Japanese Knotweed, Rhododendron, Giant Hogweed, Cherry Laurel and Montbrettia.
    g. Lighting design from new development will ensure that lux levels at the Knocksink Woods cSAC boundary are no higher than 3 lux to ensure that fauna, including bats,

using the woodland are not displaced or deterred. Any lighting for developments in the vicinity of this woodland (or near mature, dense hedgerows/tree lines in the area) shall be in accordance with 'Bats and Lighting' guidelines provided by the UK Bat Conservation Trust (Bat Conservation Trust 2009).

6. A buffer zone will be maintained around the Knocksink Wood cSAC to protect this designated site and its qualifying features. It is recommended that this buffer is approximately 30m in depth (at a minimum 15m should be maintained from the cSAC boundary in order to avoid root protection zones of mature trees within the SAC). In addition, habitat within this buffer must be planted and managed to encourage native biodiversity (in natural assemblages), to improve the current status of habitats in this area. This buffer is to be managed for wildlife with consideration given to the National Parks and Wildlife Service's draft Conservation Management Plan for Knocksink Woods cSAC. There is to be no development within this buffer zone so that it acts as an efficient barrier to potential disturbance upon the cSAC. The fence-line in this area will also be reinforced so that it acts as a deterrent to human disturbance and unofficial access into the woodland cSAC.

There are significant opportunities which could be employed to help improve the quality of the Knocksink Wood cSAC. These include:

- Where possible, appropriate management of any retained GSi1 grassland within 'East Park' immediately beside Knocksink Wood cSAC should be carried out in order to help revert this to more naturalised habitat;
- Planting of new native woodland and hedgerow , that is in keeping with the character of the area, within the retained open space areas of this AA1 zone would improve the biodiversity and green infrastructure benefits of this site; and,
- The installation of suitable wildlife nest boxes can increase the habitat suitability of the site particularly for bats and birds, this would encourage biodiversity within the AA1 zone.

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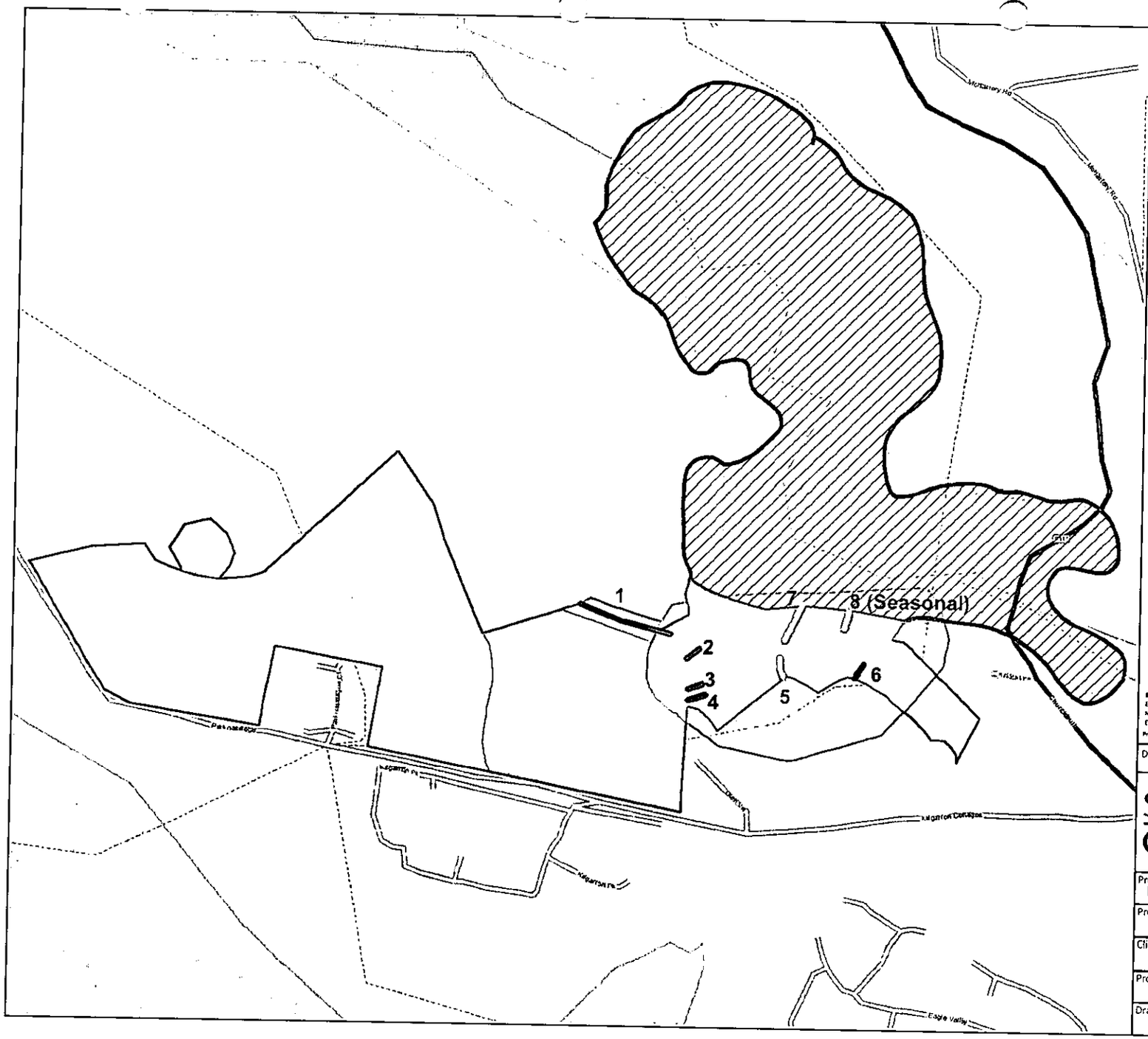
Appendix A – Ecological Sensitivity Map



Legend

- Calc_Springs_FP1 (Tufa Springs)
- Non-calc_Springs_FP2
- Knocksink Wood cSAC
- AA1 Zoned Lands

Ecological_Sensitivity_Poly

Value

- High
- Moderate
- Low
- Tufa Springs Inner Catchment Zone

Background Mapping from ArcGIS Online Topographic Mapping © Esri. Sources: Esri, DeLorme, NAVTEQ, TomTom, Intermap, increment P Corp., GEBCO, USGS, FAO, NPS, NRCAN, GeoBase, IGN, Kadaster NL, Ordnance Survey, Esri Japan, METI, Esri China (Hong Kong) and the GIS User Community

Projection: TM65 Irish Grid, Transverse Mercator.

Drawing No: 110220/01A

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Project Title: Kilgarran Hill, Enniskerry - Ecological Sensitivity

Project No.: 110220

Client: Bluetone Properties Ltd, Pricewaterhouse Coopers

Project No.:	Scale:		
110220	1:6,000 @ A4		
Drawn: RNF	Approved: AC	Rev. No.: 01A	Date: 24/10/2014

Appendix B – Detailed Botanical Report by Dr. Joanne Denyer

KILGARRAN BOTANICAL SURVEY

August 2014

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Report information

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CONTENTS

1 INTRODUCTION 4

1.1 Background 4

1.2 Aims of survey 4

2 METHODOLOGY 4

2.1 Botanical survey 4

2.2 Plant species nomenclature 4

2.3 Habitat ecological evaluation 4

3 SURVEY RESULTS AND ECOLOGICAL EVALUATION 5

3.1 Potential springs 5

3.1.1 Spring 1 5

3.1.2 Spring 2 5

3.1.3 Springs 3 & 4 6

3.1.4 Spring 5 7

3.1.5 Spring 6 8

3.1.6 Spring 7 9

3.1.7 Spring 8 10

3.2 Woodland 11

3.2.1 Oak-ash-hazel woodland (WN2) 11

3.2.2 Wet pedunculate oak-ash woodland (WN4) 12

3.2.3 Mixed broadleaved woodland (WD1) 13

3.2.4 WS1 (Scrub) 14

3.3 Grassland 14

3.3.1 Improved agricultural grassland (GA1) 14

3.3.2 Improved amenity grassland (GA2) 15

3.3.3 Improved dry calcareous and neutral grassland (GSi1) 15

3.3.4 Wet grassland (GS4)/ Marsh (GM1) 16

REFERENCES 17

1 INTRODUCTION

1.1 Background

Denyer Ecology was commissioned by Scott Cawley Ltd to undertake a detailed botanical survey for an Area Action Plan for Kilgarran, Enniskerry, Co. Wicklow. The survey area included AA1 zoned lands and woodland immediately adjacent to this zoned area. The woodland is located within Knocksink Wood candidate Special Area of Conservation (cSAC). Knocksink woodland is designated as a cSAC for two Annex I priority habitats:

- *Petrifying springs with tufa formation [7220]
- *Alluvial forests with *Alnus glutinosa* and *Fraxinus excelsior* [91E0]

1.2 Aims of survey

The aim of this survey was to undertake:

- a botanical assessment of at least three small springs (two in the woodland and one within the site) to assess their current status as petrifying springs (Annex I priority habitat: 'Petrifying springs with tufa formation');
- a botanical assessment of the immediate strip of woodland that bounds the AA1 lands within the cSAC for its potential to support the Annex I priority woodland habitat for which the cSAC is designated ('Alluvial forests with *Alnus glutinosa* and *Fraxinus excelsior*'); and,
- an assessment of the grasslands on the site to confirm their habitat classification.

2 METHODOLOGY

2.1 Botanical survey

The site was walked over by an experienced botanist and bryologist in July 2014. The survey focussed on grassland, calcareous springs and woodland within and adjacent to the project area. The main plant species, including bryophytes, were recorded for each surveyed habitat and the habitats were classified using *A Guide to Habitats in Ireland* (Fossitt, 2000). The habitat name is underlined in the text and the habitat code is given in brackets the first time the habitat is described.

2.2 Plant species nomenclature

Plant nomenclature follows that of the *New Flora of the British Isles* 3rd Edition (Stace, 2010), bryophyte nomenclature follows the *Checklist of British and Irish bryophytes* (BBS, 2009).

2.3 Habitat ecological evaluation

The ecological importance of the habitats was assessed using the criteria listed in the *Guidelines for Assessment of Ecological Impacts of National Roads Schemes* (NRA, 2009). Although this publication relates to the roads schemes, the ecological assessment criteria are not specific to a development type and are therefore relevant to any site. They form a standardised method for assessing site ecological importance in Ireland.

Site ecological evaluation:

- International ecological importance
- National ecological importance
- County ecological importance
- Local (higher value) ecological importance
- Local (lower value) ecological importance

3 SURVEY RESULTS AND ECOLOGICAL EVALUATION

3.1 Potential springs

3.1.1 Spring 1

This spring is located on the northern boundary of the site. It is associated with a drinking trough and flows west to east down a slight slope. It is heavily grazed and poached with little diversity (Photograph 3.1). Species recorded include Water-cress *Nasturtium officinale,* Brooklime *Veronica beccabunga,* Floating Sweet-grass *Glyceria fluitans* and Yorkshire-fog *Holcus lanatus.* It graded to a grassy channel down the slope to the east, losing flow and becoming dry. There were no signs of tufa formation or bryophytes typical of tufa springs. This spring is therefore **not considered** an example of the **Annex I priority habitat** 'Petrifying springs with tufa formation'. It is valued as being of **Local (higher value)** ecological importance.



Photograph 3.1: Spring 1 (view to east down slope)

3.1.2 Spring 2

This spring is located at the entrance of the eastern field, to the east of the gateway. It is a small spring and flows south to north. It was dominated by the bryophytes *Cratoneuron filicinum* and *Calliergonella cuspidata* with grassland species and Cuckooflower *Cardamine pratensis* (Photograph 3.2). There were some signs of poaching by the ponies that graze this field (Photograph 3.2). *Cratoneuron filicinum* can be a component of tufa springs, however it is also common in any wet vegetation. There were no tufa deposits or other typical tufa bryophytes. This spring is therefore **not considered** an example of the **Annex I priority habitat** 'Petrifying springs with tufa formation'. It is valued as being of **Local (higher value)** ecological importance.



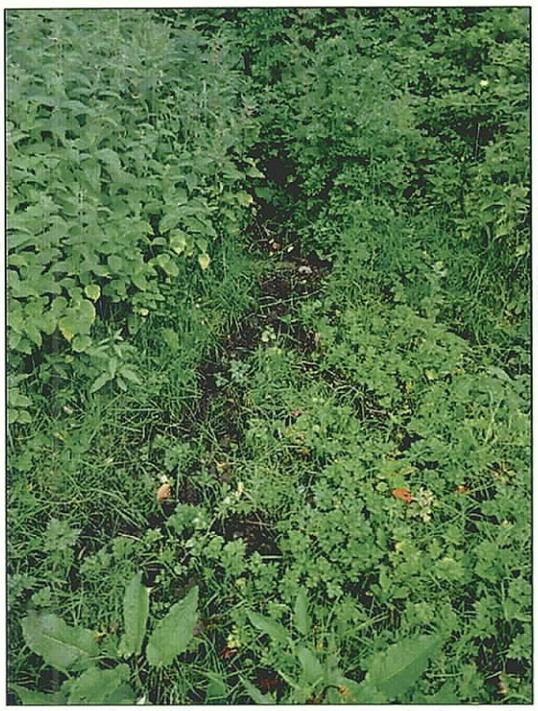
Photograph 3.2: Spring 2 (view of spring vegetation, showing bryophyte cover)

3.1.3 Springs 3 & 4

These two springs are located to the south of Spring 2 and flow west to east down a small bank. The area is overgrown with tall vegetation including Common Nettle *Urtica dioica*, Common Ragwort Senecio *jacobaea*, Broad-leaved Dock *Rumex obtusifolius* and Bramble *Rubus* fruticosus agg. . The springs support marshy vegetation with Water-cress, Brooklime, Knotted Pearlwort *Sagina nodosa,* Silverweed *Potentilla anserina*, Marsh Thistle *Cirsium palustre,* Wavy Bitter-cress *Cardamine flexuosa,* Creeping Buttercup *Ranunculus repens* and the bryophyte *Brachythecium rivulare* (Photographs 3.3 and 3.4). There was no tufa or typical tufa species present and therefore these springs are **not considered** examples of the **Annex I priority habitat** ' Petrifying springs with tufa formation'. They are valued as being of **Local (higher value)** ecological importance.



Photograph 3.3: Spring 3 showing poached, marshy vegetation surrounded by tall vegetation

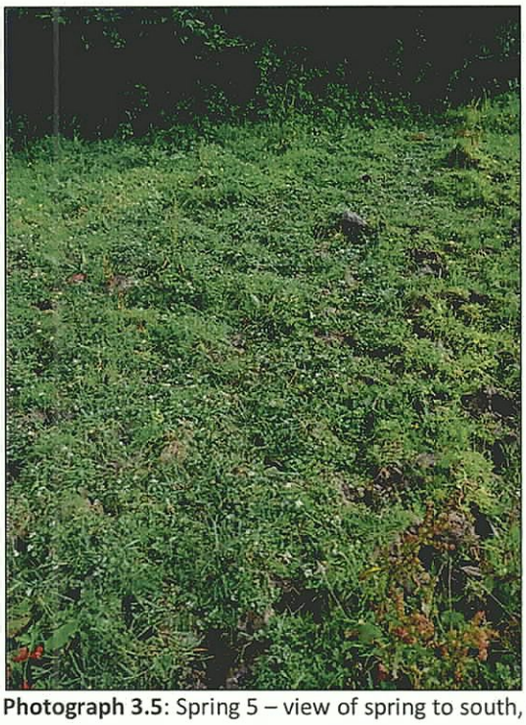


Photograph 3.4: Spring 4 showing poached, marshy vegetation surrounded by tall vegetation

3.1.4 Spring 5

Spring 5 is located in the eastern field of the survey area and flows south to north down a slight slope. The vegetation is generally marshy, with some poaching by ponies and deer. Vascular plant species include marsh species such as Water-cress, Toad Rush *Juncus bufonius* and Fool's-water-cress *Apium nodiflorum,* with Meadow Buttercup *Ranunculus acris* and other grassland species (Photograph 3.5). Some filamentous algae was present. Bryophytes include *Cratoneuron filicinum, Funaria hygrometrica, Bryum pseudotriquetrum* and *Leptobryum pyriforme* (the latter is a new Vice County record for Co. Wicklow, H20).

There was some localised tufa formation on *Cratoneuron filicinum* (e.g. Photograph 3.6). Therefore this **is considered** to be an example of the **Annex I priority habitat** 'Petrifying springs with tufa formation'. However, the tufa deposits are localised and species richness low with few typical tufa species. It is therefore not considered to be a good example of a Petrifying spring and is considered of **County** ecological importance only.



Photograph 3.5: Spring 5 – view of spring to south, up slight slope



Photograph 3.6: Spring 5 – tufa deposits on the bryophyte *Cratoneuron filicinum* within spring

3.1.5 Spring 6

Spring 6 appears to actually be the overflow of a septic tank. It is located in the eastern field and flows south to north, down a moderate slope. The outflow area is dominated by tall ruderals such as Creeping Thistle *Cirsium arvense*, Common Nettle and Bramble. Downstream the vegetation was dry grassland vegetation with bare patches from previous poaching (Photograph 3.7). There were no species typical of tufa springs. It is **not considered** an example of the **Annex I priority habitat**

'Petrifying springs with tufa formation' and is valued as being of **Local (lower value)** ecological importance.



Photograph 3.7: 'Spring' 6 – septic tank outflow into grassland (view to north-west)

3.1.6 Spring 7

Spring 7 is located within the woodland area to the south of the AA1 zoned lands and is within Knocksink Wood cSAC. The spring flows from south to north, down a relatively steep woodland bank (Photograph 3.8). Tufa formation is frequent throughout the spring, although there are no large deposits (Photograph 3.9). Bryophytes are frequent to locally abundant in the spring, with the species *Palustriella commutata, Calliergonella cuspidata, Cratoneuron filicinum, Pellia endiviifolia, Fissidens pusillus, Plagiomnium elatum* and *Eurhynchium striatum.* The main vascular plant in the spring is Opposite-leaved Golden-saxifrage *Chrysosplenium oppositifolium*. The spring is surrounded by woodland vegetation, with ground flora species such as Creeping Buttercup, Sanicle *Sanicula europaea,* Soft Shield-fern *Polystichum setiferum* and Ramsons *Allium ursinum* with bryophytes *Thamnobryum alopecurum, Fissidens taxifolius* and *Plagiothecium undulatum.*

The spring is a typical woodland example of the **Annex I priority habitat** 'Petrifying springs with tufa formation'. As it is located within a cSAC, for which Petrifying springs with tufa formation are a qualifying feature, it is valued as being of **International** ecological importance.



Photograph 3.8: Spring 7 – view of spring to south, up slope



Photograph 3.9: Spring 7 – tufa deposits on bryophytes within spring

3.1.7 Spring 8

Habitat maps supplied by National Parks and Wildlife Service (NPWS) show a second tufa spring present in the woodland area to the south of the survey site (east of spring 7). This could not be located despite several surveys in this area. The spring could be hidden by dense undergrowth,

however there was no sign of spring outflow onto the path in this area and it may be that the spring is dry in summer.

3.2 Woodland

3.2.1 Oak-ash-hazel woodland (WN2)

An area of woodland immediately north of the zoned lands, between the zoned lands and the river, is within the AAP site. Although outside of the zoned lands, this woodland is within the cSAC and so was surveyed to assess the woodland habitats present.

The main woodland type in this area is oak-ash-hazel woodland (WN2) (Photograph 3.10). This is dominated by Ash *Fraxinus excelsior* in the canopy, with occasional to frequent Sessile Oak *Quercus petraea* and occasional Sycamore *Acer pseudoplatanus,* Beech *Fagus sylvatica* and, in areas nearer the river, Alder *Alnus glutinosa.* The shrub cover is low but Elder *Sambucus nigra* and Spindle *Euonymus europaea* are occasional. The understorey supports a diverse flora with species such as the forbs: Bramble, Tutsan *Hypericum androsaemum,* Sanicle, Ramsons, Common Nettle, Garlic Mustard *Alliaria petiolata,* Herb-Robert *Geranium robertianum,* Ground-ivy *Glechoma hederacea,* Ivy *Hedera helix*, Wood Avens *Geum urbanum,* Nipplewort *Lapsana communis*, Bugle *Ajuga reptans,* Cowslip *Primula veris,* Curled Dock *Rumex crispus,* Opposite-leaved Golden-saxifrage, Enchanter's-nightshade *Circaea lutetiana,* Hedge Woundwort *Stachys sylvatica,* Honeysuckle *Lonicera periclymenum,* Cleavers *Galium aparine,* Wood Speedwell *Veronica montana* and Navelwort *Umbilicus rupestris*; Ferns: Hart's-tongue *Asplenium scolopendrium,* Soft Shield-fern *Polystichum setiferum,* Broad Buckler-fern *Dryopteris dilatata* and Male Fern *Dryopteris filix-mas*; and bryophytes: *Neckera complanata, Isothecium myosuroides, Kindbergia praelonga, Brachythecium rutabulum, Fissidens taxifolius, Eurhynchium striatum, Lophocolea bidentata* and *Atrichum undulatum.*

Due to the survey timing (July), some early flowering vascular plant species may have been overlooked, such as the Red Data Book species Yellow Archangel *Lamiastrum galeobdolon* ssp. *montanum,* which has been recorded from the cSAC. However, this will not change the woodland classification and Annex I habitat assessment. Species from cultivation, such as Ground-elder *Aegopodium podagraria,* were occasional within the woodland and along the edges of the east to west footpath at the base of the wooded slope.

This area was mapped as oak-birch-holly woodland (WN1) in an NPWS habitat map of the cSAC (2009). However the map title 'Indicative Habitat Map' suggests that not all areas may have been subject to detailed survey for this mapping project. The presence of an Ash dominated canopy, with ground flora typical of calcareous to neutral (not acidic) soil means that this area should be mapped as oak-ash-hazel woodland. This woodland type does **not correspond** to the Annex I priority habitat 'Alluvial forests with *Alnus glutinosa* and *Fraxinus excelsior*'. However, as an example of diverse semi-natural woodland within an cSAC, it is considered to be of **County to National** ecological importance. A spring flora survey would be required to confirm its ecological value.

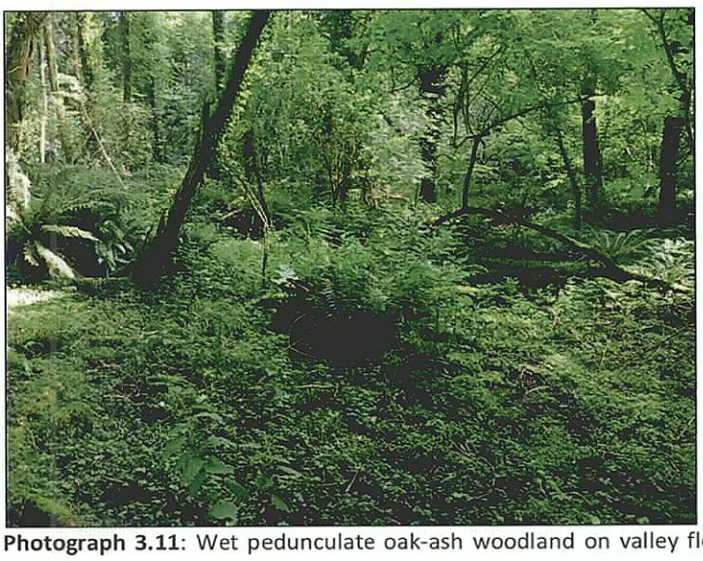


Photograph 3.10: Oak-ash-hazel woodland on steep banks north of eastern area of AA1 zoned lands (within cSAC)

3.2.2 Wet pedunculate oak-ash woodland (WN4)

On lower ground near the river there is an area of alluvial woodland wet pedunculate oak-ash woodland (WN4) (Photograph 3.11). The canopy is dominated by Ash, with occasional Alder, Sycamore and Sessile Oak. It is above the level of regular inundation but likely to be periodically flooded and has a heavy soil that is subject to waterlogging. Ground flora species included Ramsons, Bramble, Common Nettle, Wood Avens, Herb-Robert, Creeping Buttercup, Opposite-leaved Golden-saxifrage, Smooth Meadow-grass *Poa pratensis,* Water Mint *Mentha aquatica,* Remote Sedge *Carex remota*, Soft Shield-fern, Hart's-tongue, Bugle, Great Wood-rush *Luzula sylvatica,* Wood-sorrel *Oxalis acetosa,* Soft-rush *Juncus effusus* and the bryophytes *Thamnobryum alopecurum, Isothecium myosuroides, Isothecium alopecuroides, Hookeria lucens, Plagiomnium undulatum, Kindbergia praelonga, Conocephalum conicum, Thuidium tamariscinum, Rhizomnium punctatum, Dichodontium flavescens* and *Pellia epiphylla.* The calcareous spring bryophyte *Palustriella commutata* was present locally, suggesting that there is calcareous water or springs flowing into the wet woodland area.

This area of woodland **corresponds** to the Annex I priority habitat 'Alluvial forests with *Alnus glutinosa* and *Fraxinus excelsior'*, for which the cSAC is designated. It has a diverse ground flora (vascular and bryophyte) and is considered to be of **International** ecological importance



Photograph 3.11: Wet pedunculate oak-ash woodland on valley floor near river, south of eastern area of AA1 zoned lands (within cSAC)

3.2.3 Mixed broadleaved woodland (WD1)

To the west of the survey area, on the steep north-facing bank, there is an area of mixed broadleaved woodland (WD1) (Photograph 3.12). Here the canopy is dominated by non-native Sycamore, with occasional Sessile Oak (locally abundant in west) and occasional Scots Pine *Pinus sylvestris*. The understorey is relatively open due to the high cover of leaf litter and shading by dense canopy. The shrub layer is sparse, with occasional Holly *Ilex aquifolium* and Hazel *Corylus avellana*. Ground flora species present include Broad Buckler-fern, Bramble, Soft Shield-fern, Herb-Robert, Honeysuckle and the bryophytes *Mnium hornum, Thuidium tamariscinum, Kindbergia praelonga* and *Hypnum cupressiforme*. This woodland type has affinity to oak-birch-holly woodland, but with a high cover of Sycamore in the canopy. It is not an example of an Annex I woodland habitat. Given the largely native understorey, value of Sycamore to fauna species and location within a cSAC, this area of woodland is considered to be of be of **County** ecological importance.



Photograph 3.12: Mixed broadleaved woodland, dominated by *Acer pseudoplatanus*, on steep banks south of eastern area of AA1 zoned lands (within cSAC)

3.2.4 WS1 (Scrub)

Between the AA1 zoned lands in the east and the cSAC woodland to the north, there is an area of locally dense scrub (WS1) (Photograph 3.13). This has typical scrub species such as Blackthorn *Prunus spinosa,* Hawthorn *Crataegus monogyna* with abundant Bracken *Pteridium aquilinum* and Bramble at the southern edge where it transitions to grassland. This does not have affinity to any Annex I habitat. It is likely to be of some value to fauna and is considered to be of **Local (higher value)** ecological importance.



Photograph 3.13: Scrub to the south of eastern area of AA1 zoned lands (adjacent to cSAC)

3.3 Grassland

3.3.1 Improved agricultural grassland (GA1)

Several fields within the survey area supported improved agricultural grassland (GA1) (Photograph 3.14). This is a species-poor grassland type that has been improved by fertiliser and/or grazing. Typical species include abundant to dominant Perennial Rye-grass *Lolium perenne,* locally frequent Common Ragwort, Creeping Thistle, White Clover *Trifolium repens*, Broad-leaved Dock, Dandelion *Taraxacum officinale* agg., Meadow Buttercup, Common Sorrel *Rumex acetosa,* Common Bent *Agrostis capillaris,* Common Mouse-ear *Cerastium fontanum,* Yorkshire-fog, Ribwort Plantain *Plantago lanceolata,* Crested Dog's-tail *Cynosurus cristatus* and Common Nettle. This is of **Local (lower value)** ecological importance.



Photograph 3.14: Improved agricultural grassland in centre of site with frequent Common Ragwort

3.3.2 Improved amenity grassland (GA2)

There are two fields of improved amenity grassland (GA2), a larger field which is intensively mown (Photograph 3.15), and one smaller field (less intensively used) to the west of this. These support similar species to the improved agricultural grassland, but with lower diversity. Typical species include abundant to dominant Perennial Rye-grass, White Clover, Greater Plantain *Plantago major*, Dandelion, Common Bent, Daisy *Bellis perennis,* Red Fescue *Festuca rubra,* Creeping Buttercup, Common Mouse-ear and Yorkshire-fog. This is of **Local (lower value)** ecological importance.



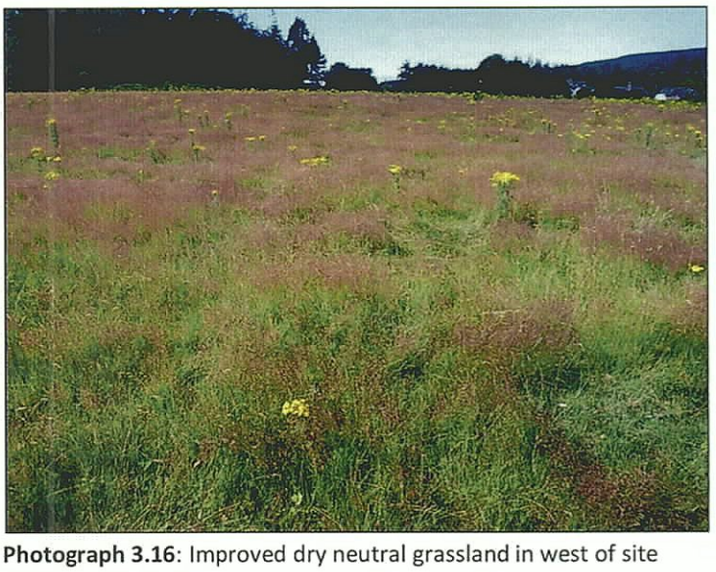
Photograph 3.15: Improved amenity grassland in south of site

3.3.3 Improved dry calcareous and neutral grassland (GSi1)

The two large cattle-grazed fields in the south-west of the site, and the large pony grazed field in the east of site, support grassland vegetation that has slightly higher diversity than improved agricultural

grassland (Photograph 3.17). The species present suggest that these fields supported dry calcareous and neutral grassland (GS1) relatively recently. However, the current low to moderate diversity and presence of frequent improved agricultural grassland species is not typical of this semi-natural grassland type. This suggests that here has been improvement by over-grazing with cattle and/ or fertilisation. Therefore these areas have been mapped as improved dry calcareous and neutral grassland (GSi1) as they represent a transitional stage from GS1 to GA1.

This grassland type contains typical improved agricultural grassland species such as abundant Perennial Rye-grass, frequent Common Ragwort, Creeping thistle and Crested Dog's-tail, Creeping Buttercup, Broad-leaved Dock, White Clover, Yorkshire-fog, Ribwort Plantain, Daisy, Common Mouse-ear and Common Chickweed *Stellaria media*. In addition, there are frequent to locally abundant dry calcareous and neutral grassland species such as Common Bent (locally abundant), Red Fescue, Sweet Vernal-grass *Anthoxanthum odoratum*, Cat's-ear *Hypochaeris radicata,* Smooth Hawk's-beard *Crepis capillaris,* Red Clover *Trifolium pratense* and Self-heal *Prunella vulgaris*. Marsh Thistle was locally frequent in lower wet areas. The eastern field is less intensively grazed and is locally transitioning to dry meadows and grassy verges (GS2). Additional species in this field include locally abundant Common Knapweed *Centaurea nigra* with Meadow Vetchling *Lathyrus pratensis,* Hogweed *Heracleum sphondylium,* Common Nettle, Yarrow *Achillea millefolium,* Hairy Sedge *Carex hirta*, Common Bird's-foot-trefoil *Lotus corniculatus* and Cowslip. These fields are of **Local (higher value)** ecological importance.



Photograph 3.16: Improved dry neutral grassland in west of site

3.3.4 Wet grassland (GS4)/ Marsh (GM1)

There is an area of wet grassland (GS4) with marsh (GM1) to the north-west of the survey area. Although this field is outside the AA1 zoned lands, it was surveyed to determine whether it supported any calcareous springs. This field comprised species rich wet grassland with a large area of marsh on peaty soil. Although calcareous species were present, with occasional tufa, this may be from calcareous surface water rather than a calcareous spring. Species recorded included Hard Rush *Juncus inflexus,* Marsh Bedstraw *Galium palustre,* Slender St John's-wort *Hypericum pulchrum,* White Clover, Ragged Robin *Silene flos-cuculi*, Common Spotted-orchid *Dactylorhiza fuchsii,* Creeping Buttercup, Field Horsetail *Equisetum arvense,* Water Mint, Brooklime, Common Mouse-ear, Silverweed, Great Willowherb *Epilobium hirsutum,* Lesser Spearwort *Ranunculus flammula,* Jointed rush *Juncus articulatus,* Marsh Thistle, *Carnation Sedge *Carex panicea,* Meadowsweet *Filipendula*

ulmaria, Floating Sweet-grass, *Quaking-grass *Briza media,* *Bog Pimpernel *Anagallis tenella,* Marsh Arrowgrass *Triglochin palustre,* Bogbean *Menyanthes trifoliata,* *Long-stalked Yellow-sedge *Carex lepidocarpa,* Common Bird's-foot-trefoil, Fool's-water-cress, Marsh Foxtail *Alopecurus geniculatus* and the bryophytes: *Calliergonella cuspidata, Brachythecium rivulare, Philonotis fontana, Cratoneuron filicinum, *Didymodon fallax, *Plagiomnium affine, Climacium dendroides* and **Campylium stellatum.* The marsh area supports some species typical of fens (marked with * above), but these are not sufficiently abundant to map this area as rich fen and flush (PF1). This field was not considered to support the **Annex I priority habitat** 'Petrifying springs with tufa formation'. However, it supports a diverse flora and is therefore valued as being of **County** ecological importance.



Photograph 3.17: Wet grassland and marsh to north-west of AA1 zoned lands

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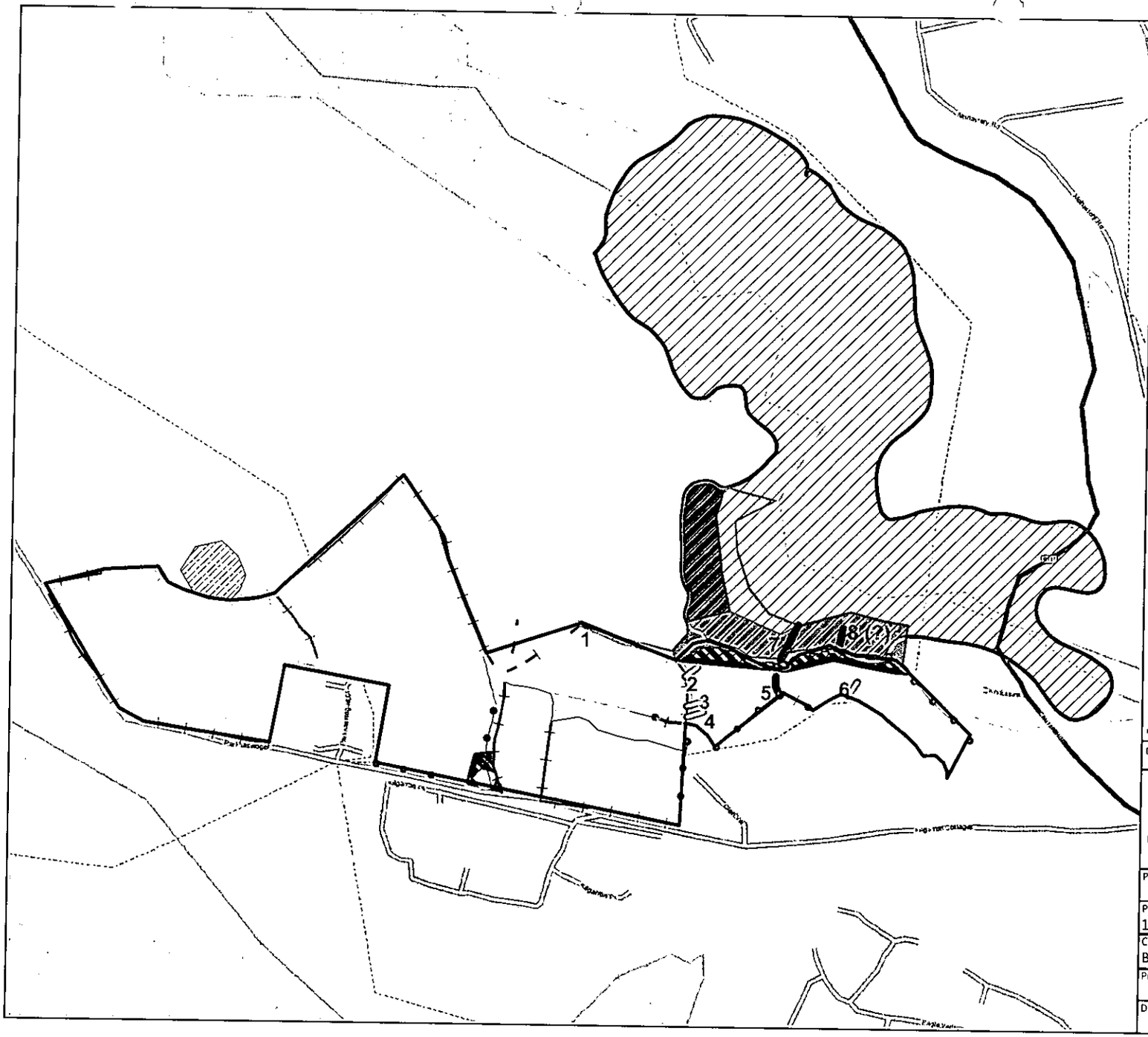
Appendix C – Habitat Map



Legend

- AA1 Zoned Lands
- FP1
- FP2
- Knocksink Wood cSAC
- WL1 Hedgerows (Moderate Value)
- WL1 Hedgerows (Poor Value)
- WL2 Treeline
- WD1
- WN4
- GA2
- GM1
- WN2
- BL3
- WS1
- GA1
- GSi1

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Projection: TM65 Irish Grid, Transverse Mercator

Drawing No: 110220/02B

scott cawley
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Suites 401 - 404,
127 Lower Baggot Street,
Dublin 2.
Ireland
Tel: + 353 1 676 9815
Fax: + 353 1 676 9816

Project Title: Kilgarran Enniskerry - Habitat Map

Project No.: 110220

Client: Bluetone Properties Ltd, Pricewaterhouse Coopers

Project No.:	Scale:		
110220	1:6,000 @ A4		
Drawn: RNF	Approved: AC	Rev. No.: 01A	Date: 30/09/2014

Appendix D – Criteria for Ecological Evaluation from:

***Guidelines for assessment of Ecological Impacts of National Road Schemes* (NRA, 2009)**

Criteria for Ecological EvaluationEcological Valuation Criteria

International Importance:
• 'European Site' including Special Area of Conservation (SAC), Site of Community Importance (SCI), Special Protection Area (SPA) or proposed Special Area of Conservation.
• Proposed Special Protection Area (pSPA).
• Site that fulfils the criteria for designation as a 'European Site' (see Annex III of the Habitats Directive, as amended).
• Features essential to maintaining the coherence of the Natura 2000 Network.[18]
• Site containing 'best examples' of the habitat types listed in Annex I of the Habitats Directive.
• Resident or regularly occurring populations (assessed to be important at the national level)[19] of the following:
  o Species of bird, listed in Annex I and/or referred to in Article 4(2) of the Birds Directive; and / or
  o Species of animal and plants listed in Annex II and/or IV of the Habitats Directive.
• Ramsar Site (Convention on Wetlands of International Importance Especially Waterfowl Habitat 1971).
• World Heritage Site (Convention for the Protection of World Cultural & Natural Heritage, 1972).
• Biosphere Reserve (UNESCO Man & The Biosphere Programme).
• Site hosting significant species populations under the Bonn Convention (Convention on the Conservation of Migratory Species of Wild Animals, 1979).
• Site hosting significant populations under the Berne Convention (Convention on the Conservation of European Wildlife and Natural Habitats, 1979).
• Biogenetic Reserve under the Council of Europe.
• European Diploma Site under the Council of Europe.
• Salmonid water designated pursuant to the European Communities (Quality of Salmonid Waters) Regulations, 1988, (S.I. No. 293 of 1988).[20]

[18] See Articles 3 and 10 of the Habitats Directive.

[19] It is suggested that, in general, 1% of the national population of such species qualifies as an internationally important population. However, a smaller population may qualify as internationally important where the population forms a critical part of a wider population or the species is at a critical phase of its life cycle.

[20] Note that such waters are designated based on these waters' capabilities of supporting salmon (*Salmo salar*), trout (*Salmo trutta*), char (*Salvelinus*) and whitefish (*Coregonus*).

Criteria for Ecological EvaluationEcological Valuation Criteria

National Importance:
• Site designated or proposed as a Natural Heritage Area (NHA).
• Statutory Nature Reserve.
• Refuge for Fauna and Flora protected under the Wildlife Acts.
• National Park.
• Undesignated site fulfilling the criteria for designation as a Natural Heritage Area (NHA); Statutory Nature Reserve; Refuge for Fauna and Flora protected under the Wildlife Act; and/or a National Park.
• Resident or regularly occurring populations (assessed to be important at the national level)[21] of the following:
  o Species protected under the Wildlife Acts; and/or
  o Species listed on the relevant Red Data list.
• Site containing 'viable areas'[22] of the habitat types listed in Annex I of the Habitats Directive.

[21] It is suggested that, in general, 1% of the national population of such species qualifies as a nationally important population. However, a smaller population may qualify as nationally important where the population forms a critical part of a wider population or the species is at a critical phase of its life cycle.

[22] A 'viable area' is defined as an area of a habitat that, given the particular characteristics of that habitat, was of a sufficient size and shape, such that its integrity (in terms of species composition, and ecological processes and function) would be maintained in the face of stochastic change (for example, as a result of climatic variation).

Criteria for Ecological EvaluationEcological Valuation Criteria

County Importance:
• Area of Special Amenity.[23]
• Area subject to a Tree Preservation Order.
• Area of High Amenity, or equivalent, designated under the County Development Plan.
• Resident or regularly occurring populations (assessed to be important at the County level)[24] of the following:
  o Species of bird, listed in Annex I and/or referred to in Article 4(2) of the Birds Directive;
  o Species of animal and plants listed in Annex II and/or IV of the Habitats Directive;
  o Species protected under the Wildlife Acts; and/or
  o Species listed on the relevant Red Data list.
• Site containing area or areas of the habitat types listed in Annex I of the Habitats Directive that do not fulfil the criteria for valuation as of International or National importance.
• County important populations of species, or viable areas of semi-natural habitats or natural heritage features identified in the National or Local Biodiversity Action Plan (BAP) if this has been prepared.
• Sites containing semi-natural habitat types with high biodiversity in a county context and a high degree of naturalness, or populations of species that are uncommon within the county.
• Sites containing habitats and species that are rare or are undergoing a decline in quality or extent at a national level.

Local Importance (higher value): • Locally important populations of priority species or habitats or natural heritage features identified in the Local BAP, if this has been prepared; • Resident or regularly occurring populations (assessed to be important at the Local level)[25] of the following: o Species of bird, listed in Annex I and/or referred to in Article 4(2) of the Birds Directive;

[23] It should be noted that whilst areas such as Areas of Special Amenity, areas subject to a Tree Preservation Order and Areas of High Amenity are often designated on the basis of their ecological value, they may also be designated for other reasons, such as their amenity or recreational value. Therefore, it should not be automatically assumed that such sites are of County importance from an ecological perspective.

[24] It is suggested that, in general, 1% of the County population of such species qualifies as a County important population. However, a smaller population may qualify as County importance where the population forms a critical part of a wider population or the species is at a critical phase of its life cycle.

[25] It is suggested that, in general, 1%of the local population of such species qualifies as a locally important population. However, a smaller population may qualify as locally important where the population forms a critical part of a wider population or the species is at a critical phase of its life cycle.

Criteria for Ecological EvaluationEcological Valuation Criteria
○ Species of animal and plants listed in Annex II and/or IV of the Habitats Directive; ○ Species protected under the Wildlife Acts; and/or ○ Species listed on the relevant Red Data list. • Sites containing semi-natural habitat types with high biodiversity in a local context and a high degree of naturalness, or populations of species that are uncommon in the locality; • Sites or features containing common or lower value habitats, including naturalised species that are nevertheless essential in maintaining links and ecological corridors between features of higher ecological value.
Local Importance (lower value): • Sites containing small areas of semi-natural habitat that are of some local importance for wildlife; • Sites or features containing non-native species that are of some importance in maintaining habitat links.

Appendix E – Ecological Criteria for Evaluation of Hedgerows

HIGH VALUE, LOCAL IMPORTANCE

- Average shrub canopy height over 5m.
- Average width at ground level over 4m.
- Dense ground cover.
- Mature standard trees more than 5 per 50 m length.
- Gaps less than 10% per 50 length.
- End connections to greater than 4 other hedges.
- Dominant tree and shrub species mainly native.
- Diversity of greater than 8 tree and shrub species.
- Typical diverse woodland ground flora present.
- Associated stream or drain with permanent water.

MODERATE VALUE, LOCAL IMPORTANCE

- Average canopy height 2 to 5m.
- Average width at ground 2 to 4m.
- Patchy ground cover.
- Mature standard trees 1 to 5 per 50m length.
- Gaps between 10-30% per 50m length.
- End connections to 2 to 4 other hedges.
- Dominant tree and shrub species mixed native and non-native.
- Diversity of 5 to 8 tree and shrub species.
- Some woodland ground flora species present.
- Parallel stream or drain with seasonal water only.

LOW VALUE, LOCAL IMPORTANCE

- Average canopy height less than 2m.
- Average width at ground less than 2m.
- Little or no ground cover.
- No mature standard trees.
- Gaps more than 30% per 50m length.
- End connections to less than 2 other hedges.
- Dominant tree and shrub species mainly non-native.
- Diversity of less than 5 tree and shrub species.
- No woodland ground flora species present.
- No parallel stream or drain.

Appendix 2

Letter from Scott Cawley

scott cawley

18.02.2016

County Development Plan Review,
Planning Department,
Wicklow County Council,
Station Road,
Wicklow Town.

Dear Sir/Madam,

Ecological Value of lands at Kilgarron, Enniskerry.

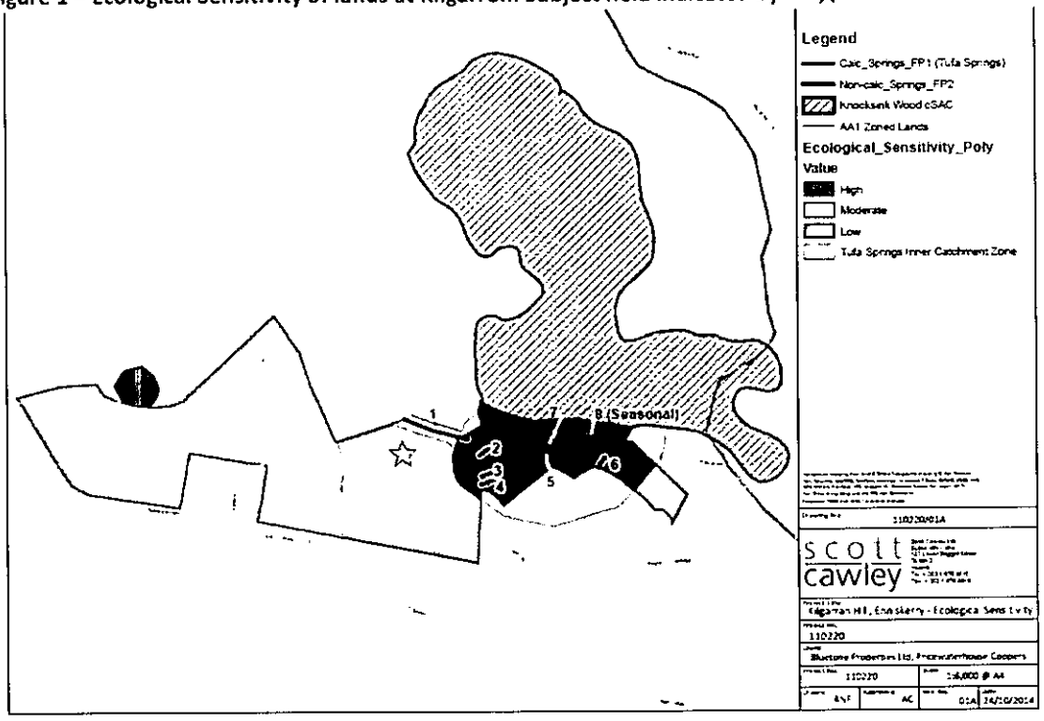
In light of the proposed rezoning of lands and proposed amendment to the development boundary of the AAP1 lands in Enniskerry within the draft Wicklow County Development Plan 2016-2022, as requested by John Spain Associates, please find below a summary of the assessment of the subject lands which lie immediately to the north of St. Mary's GAA. Scott Cawley carried out a detailed ecological assessment of this area for the proposed Kilgarron Enniskerry Action Area Plan in 2014 and 2015.

Field of Low Ecological Sensitivity [☆ within the Green Area]

A large portion of the land proposed for rezoning and omission from the development boundary of the AAP1 lands is located to the immediate north of the existing GAA pitch. Our findings indicated that the majority of this field is of **low ecological sensitivity** as seen on Figure 1 below.

At the time of survey, in April 2014, this field consisted of improved agricultural grassland (species poor, fertilised and cattle grazed). A non-calcareous freshwater spring (Spring 1) runs along the northern hedgerow which was of moderate ecological value.

Figure 1 – Ecological Sensitivity of lands at Kilgarron. Subject field indicated by ☆



Scott Cawley, College House, Rock Road, Blackrock, Co. Dublin

Tel+353- (0)1 6769815 Fax +353-(0)1-6769816

scott cawley

Spring No. 1 was described as follows *"Associated with a drinking trough and flows west to east down a slight slope. It is heavily grazed and poached with little diversity. It graded to a grassy channel down the slope to the east, losing flow and becoming dry. There were no signs of tufa formation or bryophytes typical of tufa [calcareous] springs. This spring is therefore* ***not considered*** *an example of the Annex I priority habitat 'petrifying springs with tufa formation'.* Furthermore, the hedgerow line was valued as being a native hedgerow of "Local importance (Higher value)" particularly due to the presence of the stream flow from the spring, a mature tree (with the potential for roosting bats) and its connectivity with Knocksink Wood SAC.

It is recommended that if development were proposed for this field, the hedgerow and Spring 1 (which flows towards the SAC) should be maintained and incorporated into the design. In the interests of protecting the SAC, it was recommended that a sufficient buffer is kept from the spring and associated stream flow as part of any development design to be agreed with the local authority. Notwithstanding this, as with any planning application, any proposed development application will also be subject to screening for Appropriate Assessment by the competent authority, taking into account project-specific details.

Having regard to the above it is considered that due to the low ecological sensitivity of the 'Green Area' there is no justification for their removal from the development boundary of the AAP 1 lands from an environmental or ecological perspective. It is considered that these lands are appropriate for future residential development subject to the mitigation measures detailed above.

Land of High Ecological Sensitivity (Red Area)
The lands to the north east, adjacent to the SAC are identified as being of high ecological sensitivity.

It is envisaged that these lands would be retained as passive open space in the interests of protecting the SAC and its Qualifying Interests.

Lands of Moderate Ecological Sensitivity (Orange area)
There is a small portion of land to the east of the lands that is located outside of the estimated catchment for the Tufa Springs catchment area and is deemed to be of moderate ecological sensitivity.

It is considered that this area may be appropriate for residential development subject to compliance with the mitigation measures set out in the NIR Scott Cawley (2015) *'Natura Impact Report - Provision of Information for the Appropriate Assessment of Proposed Action Area Plan at Kilgarron Enniskerry'*.

Conclusion
In conclusion, it is not considered necessary to exclude the 'Green Area' or 'Orange Area' from the proposed development boundary of the AAP 1 lands, subject to the recommendations provided during the ecological and environmental assessments carried out in 2015. The red area will be retained as passive open space in line with its identification as an area of high ecological sensitivity.

Full details and recommendations can be seen in Scott Cawley (2015) *'Ecological Assessment of Lands at Kilgarran Hill, Enniskerry, Co. Wicklow'* and the aforementioned NIR.

We trust the above is clear, however if you should wish to discuss this further at all please do not hesitate to contact us.

Kind regards,

Paul Scott

Paul Scott BSc, MSc, CEnv MCIEEM.

Scott Cawley, College House, Rock Road, Blackrock, Co. Dublin
Tel+353- (0)1 6769815 Fax +353-(0)1-6769816

Appendix 3

Letter from DTZ

DTZ
Sherry FitzGerald

Email: mairead.furey@dtz.ie
Direct Tel: +353 1 639 9382
Direct Fax: +353 1 639 9389

Our ref: EF\F:\Department\Advisory\Consultants\Projects\PWC\Enniskerry\Letter submission re development plan.docx

County Development Plan Review
Planning Department
Wicklow County Council
Station Road
Wicklow Town

19 February 2016

Dear Sir/Madam,

Re: Wicklow County Development Plan 2016-2022 - Development Plan Review

We have been requested to provide a high level overview of the commercial property market in order to address the demand for and viability of commercial development in relation lands at Kilgarron Hill. We have undertaken a deskop review of the market, based on our internal database, internet research, together with our knowledge of the locality.

Enniskerry is a small town located approximately 20 km south of Dublin City Centre and just 6 km west Bray, which would be the Main Town serving the North Wicklow hinterland, including the Enniskerry area. Enniskerry has retained its village nature with little development taking place in recent times. A barrier to development taking place has been the lack of appetite from both retail and office occupiers to locate in the general North Wicklow area, which consequently has led to a decline in rental and capital values. This in turn has had a negative impact upon the viability of commercial development in areas such as Enniskerry and indeed Bray.

With the exception of residential properties, limited transactions have taken place in areas such as Enniskerry. Therefore as an analogy, we have examined Bray which would have a greater critical mass than an area such as Enniskerry. The prolonged vacancy of multiple retail units and office accommodation in Bray and surrounding area demonstrates that demand for commercial accommodation in Bray remains subdued, despite the attractive low level rents. Typical retail rents are in the order of €20-€25 per sq ft. While office rents would continue to lag behind at €10-€12 per sq ft. As mentioned earlier, Bray would have a greater critical mass and as such would commend a higher rental rate. Therefore, areas such Enniskerry would be severely challenged in securing rents at this level.

Based on our research, comparable evidence suggests that values currently being achieved on both rental and capital value bases would not support commercial development taking place in Enniskerry generally. Therefore commercial development remains unviable. Furthermore, significant growth in rental values together with yield compression would be required in order to improve the prospects of any commercial development taking place. This is unlikely to happen for the foreseeable future.

Directors: J. Buckley, G. Conway, R. Corbett, C. Cotter, K. Donohue, B.Dooley, M. Finnegan, M. FitzGerald, I. Gaine, A. Gavin (Managing), J. Geary, J. Gill, F. Keane, D. Kellegher, P. Lynch, S. McKenna (and Company Secretary), M. O'Sullivan, K. Rothwell, B. Smyth, J. Ross (English), P. Staunton, K. Stewart, P. Waller, P. Ward.
Company Registration No. 280357. Registered Office - 164 Shelbourne Road, Ballsbridge, Dublin 4, Ireland. PSRA Registration No. 002222

DTZ
Sherry FitzGerald

In light of the above, we would be of the view that there is no demand for speculative office/enterprise type development due to the unviable nature of commercial development. Therefore, very limited commercial zoning/uses should be considered for the lands at Kilgarron Hill, Enniskerry. Any commercial development should be limited to small scale retail/retail related uses to serve the immediate local need. Moreover, this type of development should only be considered following the expansion of the population through residential development at Kilgarron Hill.

Kind regards

Yours sincerely

Mairead Furey MSCSI MRICS
Associate Director
DTZ Sherry FitzGerald

C23

Leonora Earls

From: Anna Boch [
Sent: 19 February 2016 17:52
To: Planning - Development Plan Review
Cc: Alun Owens
Subject: Submission with regard to Objective HD21 in chapter 4 Housing, draft Wicklow County Development Plan 2016 -2022

1-3 The Mews, Easthill
Newtownmountkennedy
Co. Wicklow

19th Feb 2016

To whom it may concern,

We are writing to you as residents of rural Wicklow and and wish to make a submission to the Draft Wicklow County Development Plan 2016-2022.

The changes in HD21 Housing in the Open Countryside are welcomerd, but could still offer more clarity with regard to the circumstances which will allow consideration of residential development in the open countryside.

While it states housing need, social need or economic need, are all three of these needs required to be considered or just one.

Also, the requirement that those whose principal occupation is in agriculture requires them to own and farm "substantial lands" discriminates against small scale specialist intensive rural activities such as organic holdings.

Where someone whose principal occupation is in a rural resource based activity how is the need to live in the immediate vicinity assesed?

Do all circumstances need to be fulfilled, for example a person who was in a permanent native resident of a rural area but the family home is now within development boundary merely need to show a housing need? This seems much less onerous or is it in conjunction with other criteria?

For many years building a home in the open countryside in Wicklow has been frought with different interpretations of compliance with the criteria depending on varying factors and the new development plan offers an opportunity to provide clear guidelines and direction for genuine applicants.

Yours sincerely,

Anna Boch & Alun Owens

Leonora Earls

C24

From:
Sent: 10 February 2016 21:59
To: Planning - Development Plan Review
Subject: Submission on DRAFT Wicklow County Development Plan 2016-2022: Enniskerry Town Plan
Attachments: 160210_Submission to Wicklow CC re Enniskerry Development Plan.pdf

Dear Sir / Madam
Please see our submission attached
Regards
Aidan Booth

Cobwebs Cottage
3 Kilmolin
Enniskerry
Co. Wicklow

10th February, 2016

County Development Plan Review
Planning Department
Wicklow County Council
Station Road
Wicklow Town

Re: Submission on DRAFT Wicklow County Development Plan 2016-2022: Enniskerry Town Plan

Dear Sir / Madam,

We wish to make the following submission in relation to the above mentioned development plan, and specifically the area referred to as "Action Area 1 - Lands at Parknasilloge"

1. Context and Vision for Enniskerry

Enniskerry village (population of 1,940 in 2011) is a picturesque and visually appealing village for residents and tourists alike who benefit from it's location at the foothills of the Wicklow mountains as well as amenities such as Powerscourt Estate and Knocksink Woods to name just two. As the draft development plan mentions, " Landscape plays a large part in the *town*'s character and development". The County Development Plan refers to Enniskerry as a "Small Growth Town", which seems like a misnomer as:

a) Enniskerry is not a town by any reasonable definition of same, and
b) The topography of the area (as noted in section 6.1) is such that significant new development is very difficult and entirely likely to degrade the natural beauty of the area - hence it would seem strange to regard this area as one where growth is either expected or desired for Wicklow

Consequently the population growth targets for the area (increase of 19% to 2,302 by the year 2022) seem like a short-sighted plan. Of even greater concern is the growth in housing stock targeted to allow for this population expansion (increase of 58% to 1,017 by the year 2022). Such an increase can only have a deleterious impact on the existing residents of the village, the landscape, and consequently the appeal of the area for the hugely important tourist sector.

Finally on this point, Chapter 2 of the DRAFT Wicklow County Development Plan (page 14) references that the "majority of the town plans adopted for these towns prior to the review of

this County Development Plan had a surplus of zoned land having regard to the population and housing targets set out in this plan. This was in the main due to the revised population targets included in this plan, as well as previous take up of land for housing development altering the headroom proportion[4]. Where a surplus was identified, the surplus land has been either re-designated for an alternative, non-residential use, or as a 'Strategic Land Bank' (SLB). The only exception is Enniskerry where a deficit was identified".
Why, in those circumstances, was Enniskerry treated as an exception? Given the acknowledged difficulties in developing appropriate new housing in the village and surrounding areas, and the risks that such would have to the visual beauty of the landscape, why does Wicklow County Council not simply re-use some of the surplus developmental land from other more suitable areas.

2. Social and Community Development

Just like any other community, the provision of infrastructure and facilities for community recreational purposes is a major need. The draft plan for Enniskerry refers to up to 9.34 hectares of land being made available for community / education and open active spaces (table 6.2, page 107). 72% of this land seems to be already in use for these purposes, leaving only 2.44 hectares of newly developed community areas. This is clearly not sufficient and a paltry allocation of the current land for the benefit of the local community

3. Traffic related Issues

The addition of 156 additional housing units in Parknasilloge will have a significantly detrimental effect on road safety as well as the condition of the road itself. 1.5 cars per housing unit would be a conservative estimate, meaning 234 additional vehicles travelling up and down this road, and through the village at least twice every day, which would put an immense stress on already dangerous levels of traffic through the village. The L1011 coming out of Enniskerry towards Glencree has a very steep hill. At the bottom of that hill (at Kilgarron Cottages) the road narrows dangerously given that cars are allowed to park on the left hand side (when coming from the village). During icy or even simply wet conditions this stretch is lethal as cars coming down the hill find themselves unable to stop or control their cars properly, while those cars trying to go up the hill become blocked at the bottom, tailing back to the crossroads, and even further back through the narrow road back into the village centre. This is not to mention the impact of the volume of cyclists, walkers and tourist buses who use this road to access Glencree, the Sally Gap or Glencullen.

The crossroads referred to above (R117 / Forge Road / L1011) is already dangerous. There is a large volume of traffic that already comes via the R117 (the church, school, library are all on this road, plus it is the direction from which people get to Enniskerry from places like Dundrum, Stepaside etc), and arrives at this crossroads whether intending to go straight (Forge Road - access to Powerscourt etc), turn right (L1011 in direction of Parknasilloge) or left into the village. For such traffic at this crossroads, drivers are already blind to traffic coming down the L1011 hill from Parknasilloge and views are heavily blocked to traffic coming from the village to one's left due to cars parked on the left hand side of the road. Adding this volume of traffic (estimated as 234 cars travelling twice per day through this junction primarily in the 12 hours from 7am to 7pm, equating to an additional car arriving at

this junction every 39 seconds) would add an unsustainable level of stress to this junction and road.

Put simply, the L1011 from Enniskerry is such a steep and winding road, and the aforementioned crossroads such an already difficult junction, that adding such a volume of additional traffic to it every day will undoubtedly:

a) result in a significant increase in road traffic accidents, putting lives at risk, while also
b) negatively impacting the safety and enjoyment of cyclists and walkers who use this route and who are such an important part of the local tourism-based businesses

4. Preservation of views and lines of sight and the public interest

As previously mentioned, the L1011 is a tourist and recreational artery of significant popularity due to access to Glencree, Sally Gap, Glencullen and many other places of interest. It is particularly well used by cyclists and walkers for whom the enjoyment of travelling this road in a rural and natural setting is clear. Should the development at Parknasilloge happen, the urban aspect of Enniskerry would extend a full 2 kilometres further out from the village along the L1011. Locals and tourists alike would be deprived of the views out to Dublin Bay looking eastwards from Kilmolin. Similarly the views northwards from Kilgarron Estate to the Scalp and the Dublin mountains would be entirely obscured by this proposed urban development.

All it takes is to look objectively at the proposed map of the Enniskerry development plan (page 116) to see that the AA1 Parknasilloge development in particular will dramatically change the shape and nature of Enniskerry village. The urban part of the village would now extend westwards in a ribbon-like or protruding fashion, which in turn will undoubtedly have a detrimental impact on the existing heart of the village as this mass of new houses creates a pull away from that axis. The proposal for Action Area Plan 1 includes provision for land to be made available for commercial and community use. This will accelerate this shift away from the village centre for people living on the western side of Enniskerry. Far from enhancing the area as a whole and strengthening the centre of the village, this development will end up creating 2 village centres, i.e. around the Clock Tower and this new centre in Parknasilloge. If you know the area and the steep incline of the L1011, it will be obvious that people who move into the new development at Parknasilloge will not simply stroll from there to the existing village centre and back again, but instead will either spend their recreation time in their own area, or get into their car to go to the village centre, or even worse to an urban centre further afield. This vision of village life (creating artificial new urban-like developments in rural environment and forcing people to shuttle around in cars) should be anathema to all planners in this day and age, and as far as I can see is directly contradictory to our goal of sustainable living and thriving local communities.

5. Water and Sewerage services

I note that the draft development plan notes (page 108, section 6.7) states that the water supply "system is likely to have adequate capacity to accommodate the levels of growth targeted in this plan". I find this incredibly difficult to believe, and note the use of the proviso "likely" rather than a more definite adjective. I can relate from personal experience living in Kilmolin that the water pressure here is very poor already. Our water supply is not reliable

and we regularly have discontinued water service during summer months. We had an engineer come to inspect our water pressure and he confirmed that our water pressure is well below average, and that this is a common issue in the area. I don't know what official capacity the water supply system in Enniskerry is supposed to have, but for certain it is not consistent or reliable today, and I dread to think what the impact of adding 58% incremental housing units to the system will have.

Similarly we have had recurring issues with the sewerage and wastewater system in Enniskerry, and would have grave concerns in relation the capacity issues that would arise due to the proposed developments.

6. Additional concerns

If, even considering all of the above reasons to not go ahead with the designation of Action Area Plan 1 for this development of 156 new housing units, the council still adopts this plan, then there are a number of considerations that would be paramount:

- There should be a designated green pathway from Kilmolin and Kilgarron down to Knocksink which would allow residents to walk there and back away from the busy main road and traffic.
- The maximum height of the housing units should be sensitive to the aforementioned views in section 4. Not only is this important to the new development in question, but also to ensure that other one-off developments in the locality abide by the same guidelines.
- The proposed housing unit density (20 units per ha) is much higher than the Action Area 3 lands at Cookstown and is also entirely out of keeping with the area or other villages of similar heritage and tourist value.
- Disruption to local residents during any development work should be kept to a minimum.

Yours faithfully

Aidan Booth & Paula Cantillon

C25

Leonora Earls

From: Auveen Byrne [
Sent: 19 February 2016 14:56
To: Planning - Development Plan Review
Subject: Wicklow Co. Draft Development Plan 2016-2022
Attachments: 2016.02.19 Map 7.10 Draft Wicklow Co. Development Plan.pdf.docx; 2016.02.17 Submission on Draft WCC Dev. Plan 2016-2022.pdf

Dear Sir or Madam,

Please find enclosed submission on behalf of the Brabazon Family re lands in their ownership at Belmont Demesne, Templecarrig Rd., Bray Co. Wicklow.

Please contact the undersigned at any of the contact points set out below, in relation to this submission.

I have tried to get my electronic signature entered on my document. Unusually it refuses to attach itself. Please let me know if this is a concern and I will re-send in Word format.

I would be grateful if you could acknowledge receipt of this submission by return e-mail.

Auveen Byrne,
Auveen Byrne and Associates, Consultant Town Planners,
Lioscarran House,
32 Dale Rd.,
Kilmacud
Co. Dublin
Ireland
Tel.: 00353 1 2831611
Fx.: 00353 1 2889747
E-mail: auveen@auveenbyrne.ie
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AUVEEN BYRNE & ASSOCIATES

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Lioscarran House, 32 Dale Road, Kilmacud, Stillorgan, County Dublin, Ireland.

Telephone: +353 1 2831611 Fax: +353 1 28897VAT no.: 3108374T

Email: auveen@auveenbyrne.ie : Website: www.auveenbyrne.ie

DATE: 19.02.2016

RE: BELMONT DEMESNE, TEMPLECARRIG RD., BRAY, CO. WICKLOW

ITEM: REQUEST FOR MINOR REVISION TO PROPOSED OBJECTIVE T28 IN DRAFT WICKLOW COUNTY DEVELOPMENT PLAN 2016-2022.

FOR: THE BRABAZON FAMILY, OWNERS OF BELMONT DEMESNE.

1.0 INTRODUCTION

1.1 The Brabazon family are the owners of 80.79 ha. of land known as Belmont Demesne, Templecarrig Rd., Bray, Co. Wicklow.

1.2 The lands are the subject of a proposed objective in the Draft Wicklow Co. Development Plan 2016-2022. At Chapter 7 of the Plan *"Tourism and Recreation"* , under the heading *"Tourism and Recreation Themes and Products,"* Policy T28 is

"T 28 - To facilitate and promote the development of small-scale tourist enterprises that are developed in conjunction with established rural activities such as agriculture. Such enterprises may include open farms, health farms, heritage and nature trails, pony trekking etc. In particular, to consider the development of Belmont Demesne, Delgany, (an area of 80.79 ha. as shown in Map 7.10) as an outdoor adventure/equestrian centre". (Emphasis added).

A copy of Map 7.10 is enclosed with this submission.

The current Co. Wicklow Development Plan 2010-2016 contains an exactly similar policy at Chapter 9 *"Tourism and Recreation"*. See Policy TTP2 and Map 9.11. It was inserted pursuant to a submission made on behalf of the Brabazon family to the Co. Council when that Plan was under preparation.

1.3 The Brabazon's principal interest in their lands at Belmont Demesne is in farming them. There are extensive woodlands within the Demesne, and woodland management is an ancillary activity.

Over many years they have hosted occasional events of a sporting, community and recreational nature at Belmont. Many have been hosted on a benevolent basis. Some have been hosted on a commercial basis.

1.4 In recent years they have invested in works of restoration of the walled garden to the long derelict Belmont House. They have constructed two agricultural barns in and bounding the walled garden. One, Arthur's Barn, has provenance as a film set and is an architectural curio. The result is a pleasant assemblage, of architectural conservation and "folk" interest (the walled garden and film-set barn respectively).

1.5 Looking ahead over a 6-year period, co-incident with the life of the Wicklow Co. Development Plan 2016-2022, the Brabazon family wish to continue with their principal activities of farming and woodland management.

They wish to continue with their long established activity of hosting occasional small-scale events.

1.6 The Development Plan specific objective T28 has suited their objectives well. However, the evolving physical character of the Demesne and evolving requirements of potential users means that "*Outdoor Activities/Equestrian Centre*[1]" is a somewhat narrow classification for their purposes in the coming years. This submission seeks a widening of the scope of the specific objective.

1.7 The Co. Council is asked to revise policy T28, insofar as it relates specifically to Belmont Demesne to read

".... In particular, to consider the development of Belmont Demesne, Delgany, (an area of 80.79 ha. as shown in Map 7.10), as an outdoor activity/equestrian centre, for small scale enterprises related to the primary activities of agriculture/woodland management and for occasional, small-scale events."

1.8 The background to this request is outlined below.

2.0 BELMONT DEMESNE

2.1 Belmont Demesne has been in Brabazon family ownership since the late 18th century.

2.2 Farming activity currently extends to livestock, grazing and tillage, along with a significant acreage of managed woodlands. The Brabazon family are all involved in these activities and all live in the immediate vicinity.

2.3 The ruins of the former Belmont House are located close to the southern end of the farm. An associated walled garden, 0.62 ha./1.5 ac. in area, is located to the west of the house. It would appear that both the house and walled garden were abandoned in the late 19th century/early 20th century. More recently, the walled garden has been restored by the family (see Planning History below). The house ruins and the walled garden are not protected structures.

[1] See 3.1 below where the Brabazon family embarked on development of an equestrian facility at Belmont in 2008. Planning permission was sought and granted for stabling and a sand arena. However, the on-set of the recession rendered any significant equestrian activities uneconomic.

2.4 The principal access to the demesne, and the entrance driveway to the former house and walled garden, is via a recessed gateway with stone wing walls on the Templecarrig Rd.

3.0 RECENT DEVELOPMENTS AT BELMONT DEMESNE

3.1 Walled garden and south-wall barn.

Under ref. no. 08/1280, permission was sought by David Brabazon for equestrian and farmyard facilities at the walled garden at Belmont (2 stable blocks, sheep shed, storage shed, manure pit, effluent tank, sand arena, yards, car-park and ancillary works).

During the course of consideration of that application, the planning authority requested additional information in order, inter alia, to secure appropriate treatment and restoration of the walled garden.

The proposed sand arena and one horse stable were omitted to reduce the impact of the development on the walled garden. A conservation report on the walled garden was submitted.

Condition 2 of the permission which was granted governed works of restoration of the walled garden.

The sheep shed, agricultural store and ancillary waste facilities on the south wall were constructed and the works to the walled garden carried out.

3.2 Arthur's Barn

3.2.1 In 2003 Artist, Architect, Art Director and Set Designer, Gary McGinty, was asked to design a Roman Barn for the set of Gerry Bruckheimar's film "King Arthur", starring Clive Owen and Kiera Knightly amongst others.

Assisting in the design process was Peter McCurdy of McCurdy and Company, the world renowned specialists in Historic Timber Framed Buildings, who in due course constructed the Barn. McCurdy and Co. are perhaps best known for their authentic reconstruction of Shakespeare's Globe Theatre in London, project that needed extensive research, skill and knowledge and took almost a decade to complete.

King Arthur's Barn was erected on the film set created at Ballymore Eustace in west Co.Wicklow, which consisted of a fort with multiple buildings. The key building was the Barn, along with several kilometres of what was a reproduction of Hardrian's Wall.

At the conclusion of the filming of "King Arthur," the barn frame was offered for sale. Having generated much interest and some press coverage at the time, the barn remained unsold. It was of course a project not without difficulties and needed someone with vision. David Brabazon was the person who, with encouragement, acquired the barn. He then had to have it dismantled and transported to east Wicklow, where it was stored.

3.2.2 It was initially proposed to erect Arthur's Barn adjacent to the walled garden as a film prop. However, that project was abandoned. Pursuant to planning permission ref. no. 10/2636, it was

erected in the restored walled garden, as part of the farm complex (barn) and instead of the barn that had been permitted under ref. no. 08/1280 .

4.0 SPORTING AND RECREATIONAL ACTIVITIES AT BELMONT DEMESNE

4.1 Long established events

There is a very long history from the early 1900's, of Belmont demesne being made available by the Brabazon family to many organisations for country activities. Selected examples are:

Scouts/Girl Guides.

Mr. Brabazon's grand-father was a friend of Baden-Powell, and was a founder of the scouting movement in Ireland. His father continued the patronage of the Scouts organisation. David Brabazon continues to facilitate use of the farm by the Scouts.

The Scouts have used Belmont for occasional camping activities from as early as 1911. From the 1930's to the 1970's, Belmont was host to the annual Scouts' Jamboree, the national gathering of scout troupes, until the organisation acquired land at Lough Dan in the 1970's.

Since then, smaller groups of scouts and girl guides have used the lands at Belmont regularly, with up to 100 cars delivering children to events. Cars are brought onto the land for disembarkation. Marshals within the scouts/guides organisation are appointed to facilitate vehicle movements through the gate.

Leinster Motor Club

Motor Cycling Ireland and Leinster Motor Club have both had a long history of running events at Belmont, dating from the 1950's. The events include Mud Plugging – the running of specially made 4-wheeled vehicles over an off-road course, a test of driving skill. Also included are vintage and veteran car displays. The events are held annually.

Events attract c. 40 entrants and their spectators (usually limited to families and close friends), a total of perhaps 120 attendees. Vehicles are driven to the event or brought on trailers, occasionally in lorries.

Attendees would be from Leinster.

Greystones Cricket Club.

The Club holds an annual event at Belmont. It is attended by c.150 people.

Bray Pony Club

The Club has been in existence since the 1960's. Prior to that (since at least the 1920's) the club was a subsidiary of the Bray/Ward Union Hunt.

The Club runs an annual event at Belmont of 1 week's duration.

Up to 100 entrants are attracted. The event is also attended by their family supporters and spectators, instructors, judges and Club committee members, catering committee, etc.

Traffic generated would be cars with horse boxes and some service vehicles.

4.2 Recent events

With emerging developments in the area of sport and events, the nature of activities hosted at Belmont has evolved. For example, in conjunction with the adjoining Killruddery Estate, the "Hell and Back" outdoor endurance race has been run over the grounds at Belmont.

Pursuant to ref. nos. 08/1280 and 10/2636 (see 3.0 above) a pleasing and interesting assemblage of agricultural buildings and walled garden enclosure has been created at Belmont Demesne. Arthur's Barn, in particular, is a curio by virtue of its design, execution and provenance.

Because of the very nature and interest of the structure and the awareness of its existence by friends, family and the film industry, there has been occasional use made of Arthur's Barn and adjacent lands for events (weddings, parties), and for filming. This is despite the fact that the Barn has never been advertised as a venue for hire or for any other purpose, and remains for the majority of the year an agricultural building.

5.0 BELMONT DEMESNE – 6 YEAR TIME HORIZON

5.1 For the period of the forthcoming Wicklow Co. Development Plan 2016-2022, the proposal of the Brabazon family is to continue with farming as the principal activity at Belmont Demesne.

5.2 They propose to continue with hosting occasional events as part of their philanthropic mission.

5.3 They also wish to continue to diversify economic activity at the Demesne, as the current Development Plan has encouraged. To this end, they wish to make occasional use of the land and its emergent agricultural building complex (barns and walled garden) for small scale events and filming.

5.4 In short, there is a willingness to make occasional use of Belmont Demesne, the 80 ha. farm and its buildings, in the tradition that has evolved over the last century, and as it continues to evolve, for events both charitable, social and private as may arise from time to time.

5.5 We suggest that this is in the interest of proper planning and sustainable development.

- Policy TTP2 of the current Plan encourages diversification of activity at Belmont Demesne. What is sought now is a broadening of the policy to encompass evolving demand.
- Proposed events and activities at Belmont will be occasional, and will not detract from the principal farming use.
- Proposed uses are specific to the attributes of the Demesne – the availability of a significant land area for sporting activities, the particular attraction of the building assemblage.
- A limitation on the use of the Demesne is the fact that it is served by Templecarrig Rd., which has limited carrying capacity. The small scale events that are and will be hosted at Belmont will not exeed the carrying capacity of the road. Safe access can be provided to the Demesne by modification of the existing entrance as exempt development.

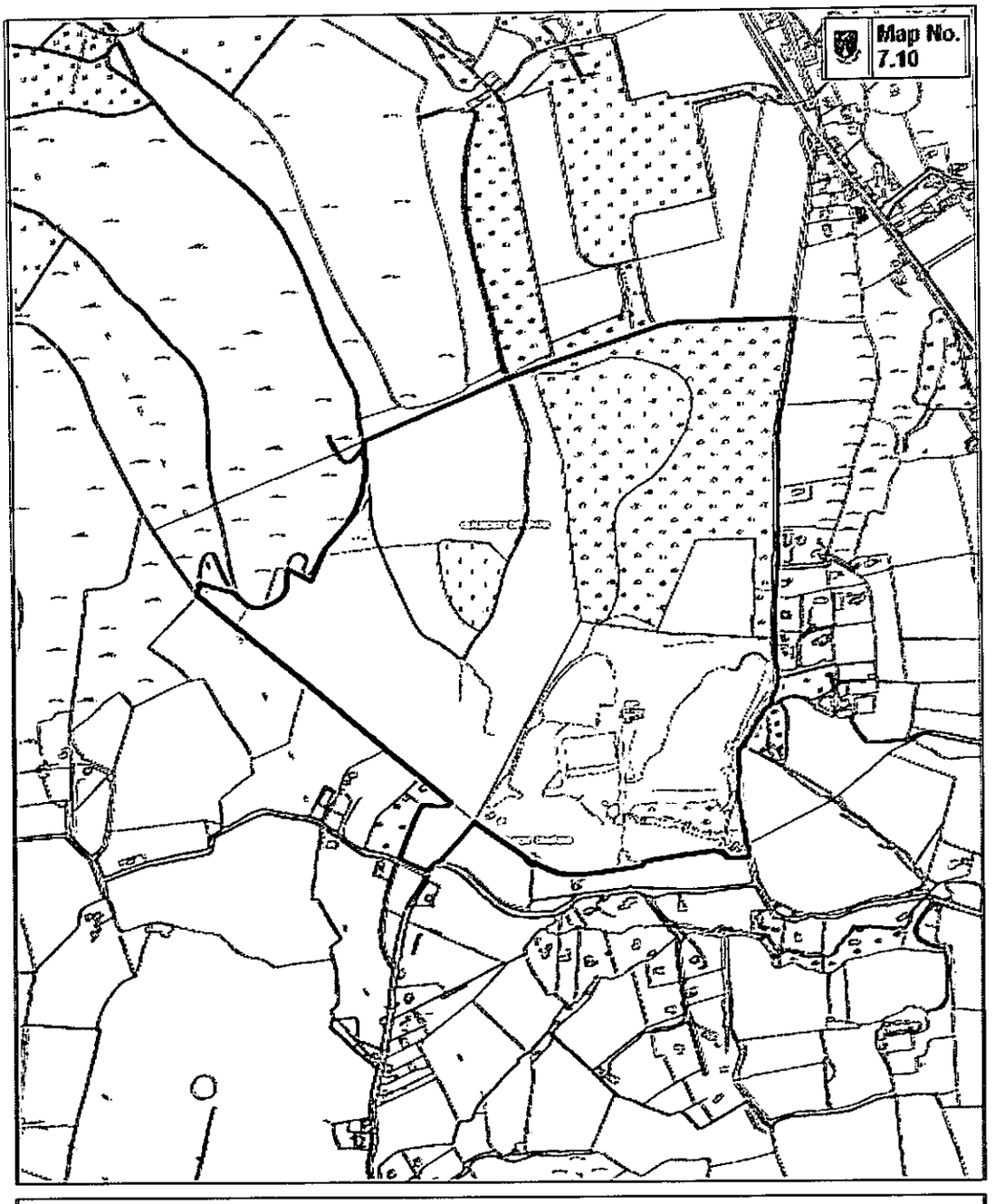
6.0 REVISED POLICY T28

To encourage the above activities of the Brabazon family, the Co. Council is asked to alter policy T28 to read:

"T 28 - To facilitate and promote the development of small-scale tourist enterprises that are developed in conjunction with established rural activities, such as agriculture. Such enterprises may include open farms, health farms, heritage and nature trails, pony trekking etc. In particular, to consider the development of Belmont Demesne, Delgany, (an area of 80.79 ha. as shown in Map 7.10) as an outdoor adventure/equestrian centre, for small scale enterprises related to the primary activities of agriculture/woodland management and for occasional, small-scale events."

SIGNED

AUVEEN BYRNE, B.A., DIP.T.P., M.I.P.I.



Zoning for Outdoor Adventure/Equestrian centre at Belmont Demesne, Delgany

DRAFT WICKLOW COUNTY DEVELOPMENT PLAN 2016-2022

Wicklow County Council
Planning Department

Maps Not To Scale

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C26

BRAMBLE GLADE SUBMISSION TO WICKLOW CO. COUNCIL

Following a meeting of Bramble Glade residents on Tuesday 9th February 2016 and having reviewed the Draft County Development Plan 2016-2022 and in particular the Ashford Town Plan of the main Draft, we have noticed two clear mistakes/anomalies on Draft Map No. 1 entitled "Land Use Zoning Objectives"

Firstly: the existing open space/community green located in the heart of Bramble Glade is not separately named or classified as "OS - Open Space". This should be so shown in the Draft Plan coloured dark green according to your own classification. This estate as you know was formally taken in charge in December 2014. Please confirm that the Council will rectify the omission of correct classification before the Draft Plan is submitted to the county councillors for adoption.

Secondly: the field area immediately to the south of Bramble Glade open space/green area and running down to the Vartry River is erroneously included and shown in the same Draft Map No. 1 as "RE - Existing Residential". Please be advised that these "field lands" are governed by the provisions of a Section 38 Agreement executed by the Council with the original developer of Bramble Glade (Ardal Construction Ltd.) in 1992. We have copies of this Agreement with our individual title deeds. This Agreement restricts the use of these lands to "agricultural, open space of playing field uses". In the current Town Plan these "field lands" are designated as "private open space". The Council has not used this designation in the current Draft Plan.

We look forward to hearing from you as soon as possible with clarifications and confirmations.

Geraldine Kennedy
Pinecroft
20 Bramble Glade
Ashford
Co Wicklow

12th February 2016

WICKLOW COUNTY COUNCIL
16 FEB 2016
PLANNING DEPT.
RECEPTION
16 FEB 2016
Time.....

On behalf of Bramble Glade Residents, signatures attached.

Bramble Glade Residents

House No.	Signature	Signature
29	Maria Dowling	
12	Martina McDermott	
26	Colin Keane	
5	Brian O'Reilly	
23	[illegible]	
24.	Michael & Phyllis [illegible]	
16	Colin & Joyce Langran	
25	Fiona McDonnell	
6	Niall Nolan	
13	Colin Quinn	[illegible]
27	Ruth Farney	
4	[illegible]	
30	Jenny Purcell	Michael Purcell
20	Geraldine Kennedy	
20	Conor Kennedy	
22	Sebrie E Sheehan	
29	[illegible]	
28	Parkin [illegible]	
11	Ronnie Coates +	Lilian Coates
19	Brenda Hamilton.	[illegible]
18	C/M 12 Bird	
31	Keith [illegible]	Gillian Kinsella.
21	[illegible]	

C27

Leonora Earls

From: Bray Head Residents Association [
Sent: 17 February 2016 18:05
To: Planning - Development Plan Review
Cc: Anne Willoughby; Liz Ferris; Karl Couse; Kathryn O'Reilly; Karina Tierney; Vincent Keating; paulineokeeffe48@gmail.com
Subject: Submission to Draft Wicklow Development Plan 2016-2022
Attachments: BHRA Submission to the draft WDP 2016 .docx

To: Wicklow Co Co Planning

I wish to submit the attached brief submission on the Draft Wicklow Development Plan 2016-2022 on behalf of the Bray Head Residents' Association.

--
Best regards

Clare O'Connor
Secretary,
BHRA

Bray Head Residents' Association

Submission to the County Wicklow Development Plan 2016-2022

The Bray Head Residents' Association (BHRA) appreciated the opportunity to attend a recent Public Consultation Meeting on the Wicklow Development Plan and, arising from subsequent perusal of the Draft Plan, wishes to make the following submission.

Our specific area of interest is in the preservation and enhancement of Bray Head in accordance with the Special Amenity Area Order (SAAO), 2007.

In this regard we are alarmed to see that the 2016-2022 Draft Plan does not require any environmental assessment to be submitted where it is deemed that a proposed development could have significant effects on the environment of the area defined as Cell 2 of the Coastal Zone, which encompasses the area protected under the SAAO.

An explicit requirement for an Environmental Impact Assessment is contained in the 2007 SAA Order [Policy 1.7.1] and is included in the current 2010-2016 Wicklow County Development Plan [see point 8 of Objective CZ2 in this DP].

The omission of this requirement from Objective CZ2 of the 2016-2022 Draft Plan in the absence of any appropriate replacement, is incomprehensible and flies in the face of the commitment in Objective NH43 of the same Draft Plan "To implement the measures set out in the Bray Head SAAO".

It is also directly contrary to the assurances given by the Chief Executive of Wicklow County Council in response to BHRA's submission to the pre-planning phase of the consultation process where he promises that the new plan "will maintain and strengthen" the provisions of the 2010-2016 Plan that "ensure that any future development or works to this area are strictly in accordance with the provisions of the existing SAAO" [see p107 of First Chief Executive's Report on the Wicklow County Development Plan 2016-2022].

Far from strengthening these provisions, the omission from the Draft Plan of any requirement for an appropriate environmental evaluation of a proposed development significantly weakens the Development Plan's underpinning of the Bray Head SAAO. It also contradicts all past and current pledges of the Council's commitment to the preservation and enhancement of Bray Head which, as indicated in the current Bray Town Development Plan "has long been recognised as an area .... of local, National and European importance".

This omission also significantly undermines public confidence in the Council's willingness to implement it's statutory obligations related to the SAAO.

BHRA hopes that the omission is the result of some oversight that will be rectified immediately. We look forward to the inclusion of a requirement for an appropriate

environmental evaluation of development proposals in Objective CZ2 of the final 2016-2022 Development Plan.

C28

Leonora Earls

From: [redacted]
Sent: 15 January 2016 16:12
To: Planning - Development Plan Review
Subject: Re: Draft Wicklow County Development Plan 2016-2022 - Enniskerry Town Plan (1689)

Dear Sir/Madam,

1. I have been reviewing the Draft Wicklow County Development Plan 2016-2022, in particular, Maps Nos: 1 to 3 of the Enniskerry Town Plan. I have an especial interest in "Map No: 3 Title: Indicative Flood Zones". The copy of the Map which I have downloaded is 'A4' size only. Given its limited size, it is almost impossible to identify accurately properties affected by the 'Flood Zones' as identified on the Map. I was wondering if it is so possible, therefore, to see or get a larger scale copy of this map from the Council which would enable one to identify accurately the affected properties.

2. Could you also, please, if it is possible direct me as to the source of the information as represented on the Map re: the Flood Zones and indicate whether or not it is possible to view that source.

3. Thank you for your assistance in this matter.

Regards

Jim

Jim Brogan, Planning and Development Consultant,
Unit B1 Laurel Lodge Business Centre, Laurel Lodge, Castleknock, Dublin 15.
Ph/Fax: 01-8229682; Mob: 087-9978393; E-mail: broganjim@eircom.net

029

Leonora Earls

From: Wicklow County Council [
Sent: 18 February 2016 16:35
To: Planning - Development Plan Review
Subject: Form submission from: Pre-Draft Submisson - Wicklow County Development Plan 2016-2022

Submitted on Thursday, February 18, 2016 - 16:35 Submitted by anonymous user: [83.71.205.225] Submitted values are:

Name: Ruth Buchanan Ross
Organisation, Group, Company, etc :
Address: Glenbrook, Enniskerry, Co. Wicklow
Email:

--Topics--
-:
-:
-:
-:
-:
-:
-:
-:
-:
-:
-: Local_Plans
-:
-:

Submission - If you wish to make comments on a topic, please fill in the box below:
On behalf of my mother-in-law, Ruth Isabel, Ross of Knockmore, Enniskerry, Co. Wicklow, I wish to query the proposals on Page 112 to establish an amenity walk. It appears that the walk will extend across privately owned land. At present the lane, known locally as Lover's Leap Lane, runs alongside Knockmore gardens and is maintained by the owners of Dargle Cottage and Knockmore.My mother-in-law is concerned about security as well as the increased footfall.
Can you let me know that the proposed plan will not encroach on her land? If it does, we will feel obliged to lodge an objection.
Regards,
Ruth Buchanan Ross

Alternatively you can attach your submission (10MB limit on attached files):
Attachment No.2 (10MB limit on attached files):
Attachment No.3 (10MB limit on attached files):

--Town / Settlement Plans--
-:
-:
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Submission - If you wish to make comments on a Town / Settlement Plan please type into the box below:
Alternatively you can attach your submission (10MB limit on attached files):
Attachment No.2 TP's (10MB limit on attached files):
Attachment No.3 TP's (10MB limit on attached files):

The results of this submission may be viewed at:
http://www.wicklow.ie/node/810/submission/2148

C30

Mr Willie Burke
Apartment 2,
La Touche Place,
Eden Road,
Greystones,
Co. Wicklow.



Wicklow County Council,
Planning Department,
County Buildings,
Wicklow Town,
Co. Wicklow.

19th February 2016

RE: Lands at Ballinahinch Newtownmountkennedy

Dear Sir/Madam,

I Willie Burke of Apartment 2, La Touche Place, Eden Road, Greystones, Co. Wicklow propose that the attached current zonings be carried forward in the County Development Plan 2016-2022.

We are now exiting the worst recession in memory and there is anticipated to be a demand for both the medical and tourism uses shown.

A Tourist Attraction at this location would be a major boost for County Wicklow. This would be in accordance with the sustainable development of the area.

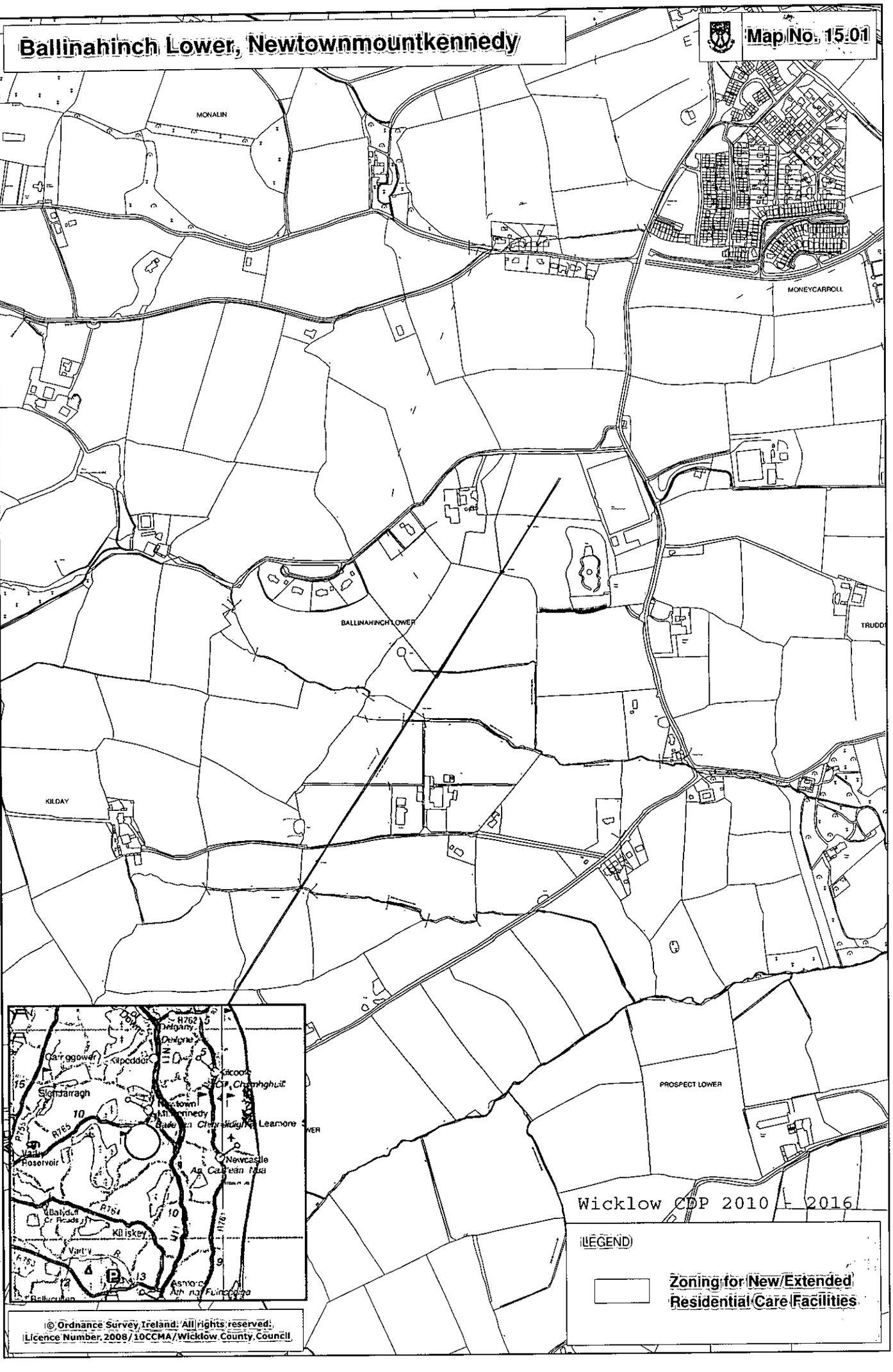
I would further suggest that these lands be included in the boundaries of the Newtownmountkennedy Local Area Plan.

Yours sincerely,

Willie Burke

Ballinahinch Lower, Newtownmountkennedy

Map No. 15.01



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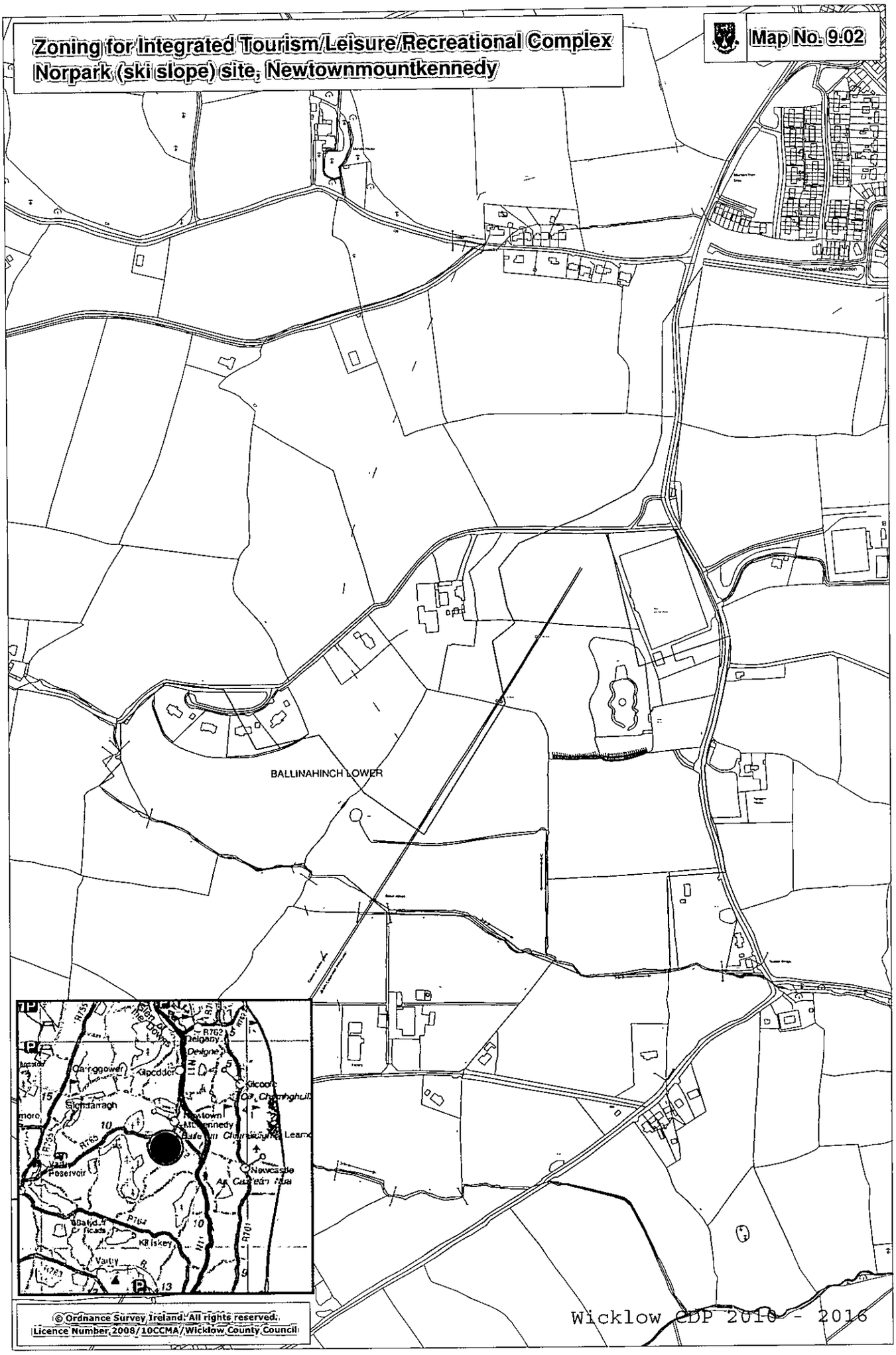
Wicklow CDP 2010 - 2016

LEGEND

Zoning for New/Extended Residential Care Facilities

Zoning for Integrated Tourism/Leisure/Recreational Complex Norpark (ski slope) site, Newtownmountkennedy

Map No. 9.02



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C31

Leonora Earls

From: deirdre burke [redacted]
Sent: 02 December 2015 19:10
To: Planning - Development Plan Review
Subject: preservation of buildings/arklow

attn of Deirdre Burns

I am writing with regard to the preservation of 2 specific buildings in ark low , the first is Tallons farm on Emo Clew road. This farm building is one of the oldest intact original houses i have ever seen, I believe the gate posts are from 17 th century , one is still totally complete,, this property would have made a beautiful heritage park and visitor centre . I have travelled through Ireland photographing and painting Vernacular buildings and this one is by far the finest original I have come across. Another building is Tom Kavanaghs house in the middle of the golf links, A lovely example of rural vernacular building, and a beautiful addition to the links and the walk way through it and deserves to have a listing on it. Another major concern for many in the town is the opening up of the Arklow Marsh to walkers,, there is a committee that have received substantial funding and have been fundraising themselves for about 3 years for this walk, and it does have the backing of the council, fortunately access is a problem at the moment. My main concern would be the wildlife, it is such a sanctuary to what is left in Arklow and we should be doing all we can to preserve it, especially the building up of banks at the edge of the river for habitation,. Arklow has become an open dump and if this walk is open it will end up as such,, a brilliant place for drug users , and dumpers, every other amenity has been destroyed , why open up the only piece of heaven left in the town to have it destroyed. I would ask you to consider having a protection status put on the reed beds and marsh.
thank you for your time

regards

Deirdre Burke.

acknowledged

C32

Leonora Earls

From: Enda O'Leary
Sent: 19 February 2016 15:40
To: Planning - Development Plan Review
Cc: Planning - Planning and Development Secretariat
Subject: Submission for Consideration – County Development Plan Review
Attachments: Cover Letter Submission.pdf; Site Layout Plan Concept Submission.pdf; Site Location Map Submission.pdf

To whom it concerns,

Please find attached:

1. Cover letter
2. Site Layout Plan 1-500 on A1 (1:1000 on A3)
3. Site Location Map 1-2500 on A4.

I trust this is to your satisfaction and that you can ackowledge receipt of this submission at your earliest convenience.

Regards

Enda O'Leary

Arthur O'Leary & Associates Ltd
Architectural & Planning Consultants
81 Main Street,
Main Street,
Gorey, Co. Wexford

Tel +353 53 94 22216
Mob +353 87 699 3198

ARTHUR O'LEARY
& ASSOCIATES LTD
Architects & Planning Consultants

81 Main Street, Gorey, Co. Wexford Tel: 053 - 9422216/9421108

Our Ref: **EO'L/ MC** **19.02.2016**
Your Ref:

County Development Plan Review, **by email: planreview@wicklowcoco.ie**
Planning Department,
Wicklow County Council,
Station Road, Wicklow Town

Re: Submission for Consideration – County Development Plan Review
Applicants: **Martin Byrne**
Address: **Ballintemple, Ballycoog Village, Arklow, Co. Wicklow**

To Whom It May Concern:

We act on behalf of Martin Byrne to prepare and submit the attached submission relating to the proposed new County Development Plan 2016 – 2022.

Our client is the registered owner of 2.52 hectares of land in Ballintemple, Ballycoog (WW32240F). The site layout plan attached indicates part of these lands. Our client proposes the concept of 11 dwellings and a childcare facility and associated site and ancillary works with connection to the existing 150 PE sewage wastewater treatment system as permitted under 03/8969. The proposed site area is circa 2.188 hectares.

Please note that in the best interest of the villages existing and future proposed developments, the applicant is offering a portion of lands to be taken in charge of by the local authority, to be used for sewage and surface pipelines in order to establish a gravity feed line to the existing sewage wastewater treatment system. The proposal facilitates either full or partial attenuation of all surface water produced within the site environs and, if applicable, other areas within the village confines.

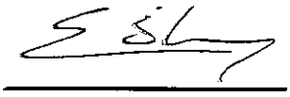
The proposal represents a medium density development model to reflect the rural nature of the sites environs. The proposal is sympathetic to the privacy and amenities already enjoyed by the residents of the dwellings to the west of the site.

The proposal of the childcare facility located in relative close proximity to the local primary school is quite embryonic but is conscious of the relationship between such

entities and the need for such amenities in regions such as Woodenbridge and Ballycoog itself.

I trust that this submission shall be given due consideration and will be looked upon favourably.

Yours sincerely,

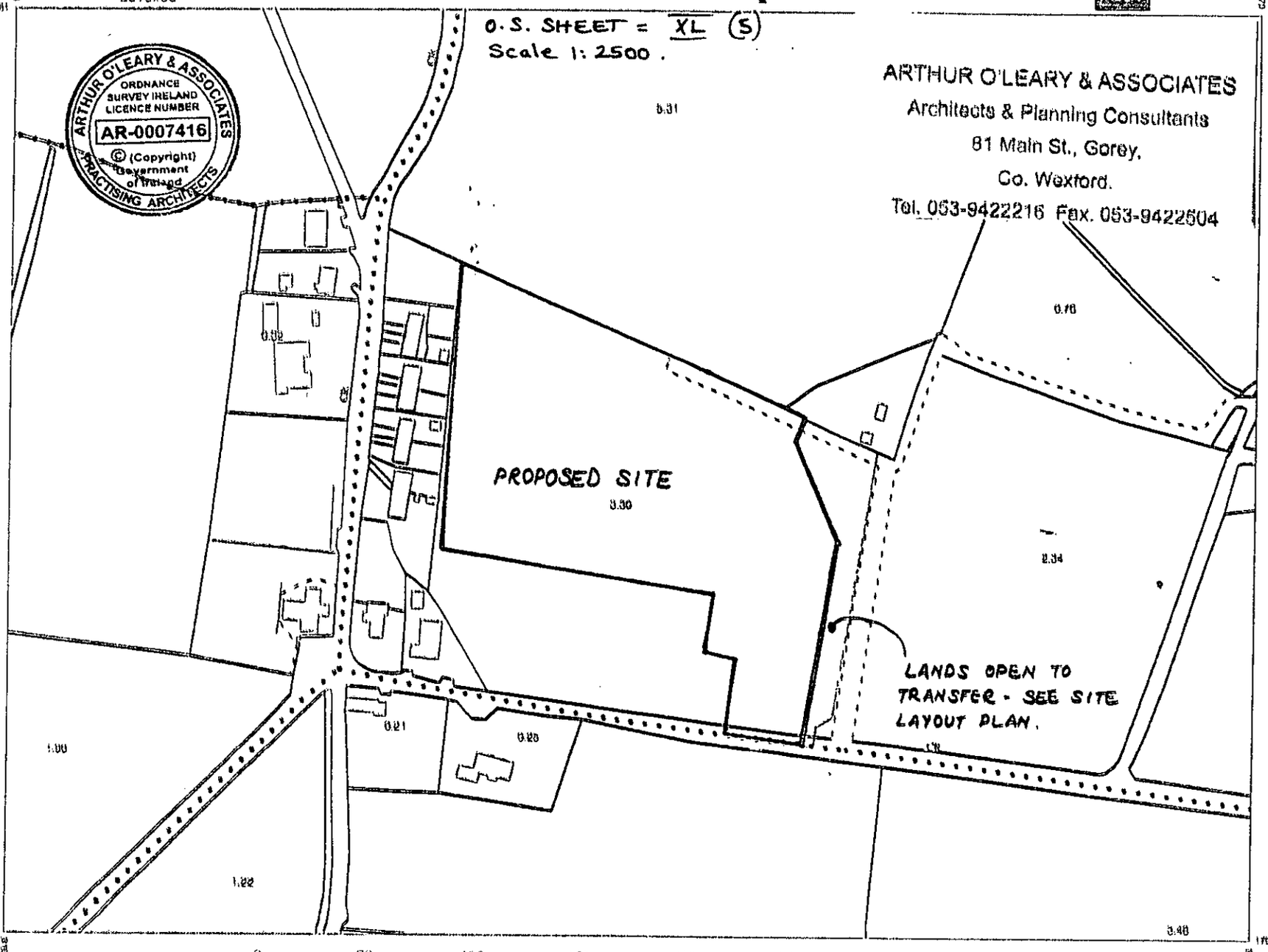


Enda O'Leary

Surveyed 2000
Revised 2000
Levelled

Rural PLACE Map

O.S. SHEET = XL (5)
Scale 1: 2500.



ARTHUR O'LEARY & ASSOCIATES
Architects & Planning Consultants
81 Main St., Gorey,
Co. Wexford.
Tel. 053-9422216 Fax. 053-9422504

ARTHUR O'LEARY & ASSOCIATES
ORDNANCE SURVEY IRELAND LICENCE NUMBER
AR-0007416
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PRACTISING ARCHITECTS

ITM CENTRE PT COORDS
716604,676005

DESCRIPTION

MAP SHEETS

Digital Map
4300

THE MAP CENTRE, WATERFORD
Ordnance Survey Ireland

Produced by The Map Centre,
Burchall House, Parnell Street, Waterford
On behalf of Ordnance Survey Ireland,
Phoenix Park, Dublin 8.

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N

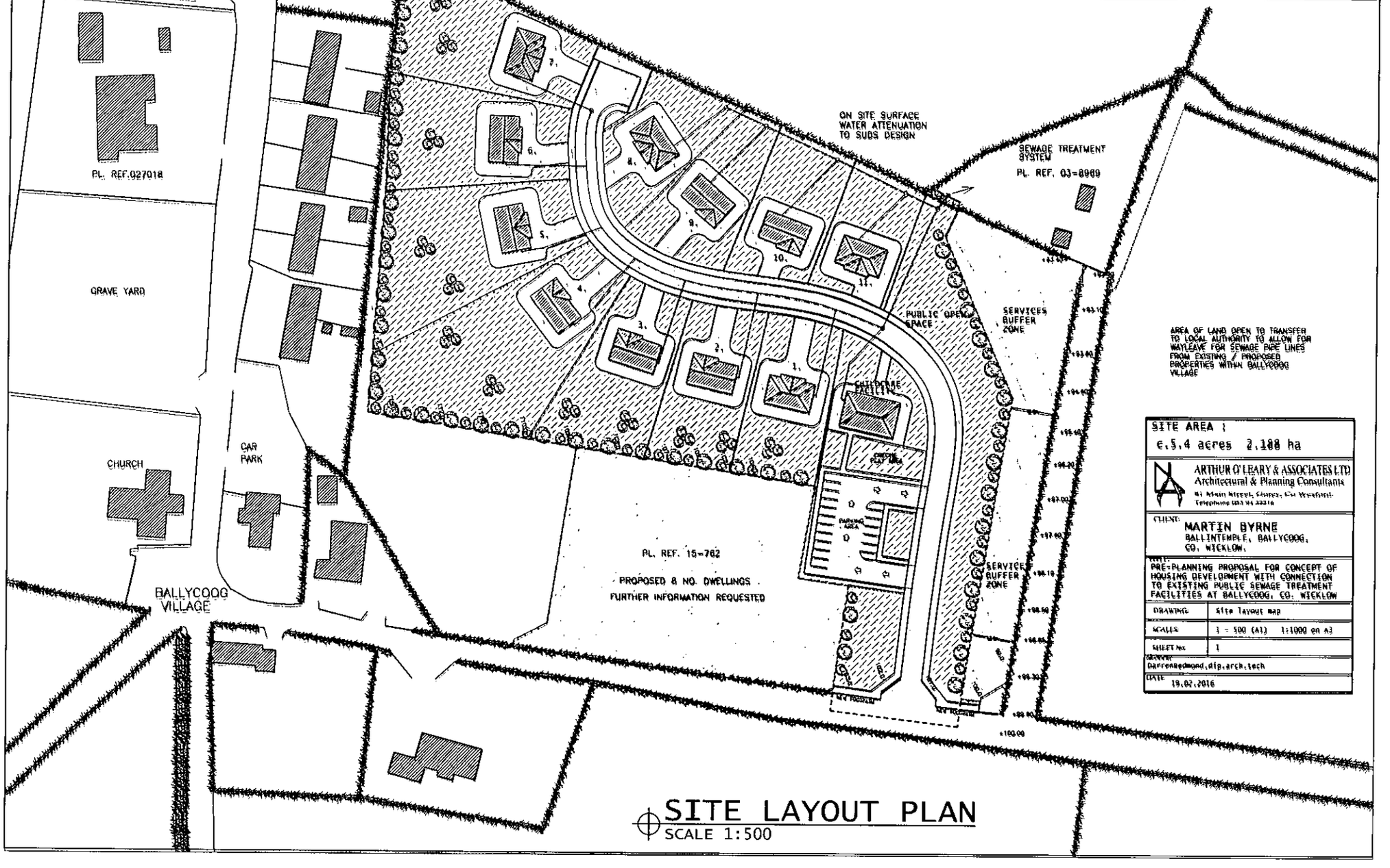
Scale:- 1:2,500
Scála:- 1:2,500

0 50 100 150 200 250 Metres
0 100 200 300 400 500 Feet

Plot Ref. No. 25253639_1_1
Plot Date 09-FEB-2016

SUBMISSION FOR CONSIDERATION FOR WICKLOW COUNTY DEVELOPMENT PLAN 2016 - 2022

CONCEPT FOR 11 DWELLINGS & CHILDCARE FACILITY AT BALLINTEMPLE, BALLYCOOG, ARKLOW, CO. WICKLOW



SITE LAYOUT PLAN

SCALE 1:500

C38

Leonora Earls

From: Louise Gaskin
Sent: 19 February 2016 16:56
To: Planning - Development Plan Review
Subject: Submission to Draft County Development Plan 2016 - 2022
Attachments: Submission to Draft County Development Plan 2016 2022.doc

Please find attached our submission to the Draft County Development Plan 2016 – 2022.

Your sincerely

Frank & Louise Fenelon

Paul & Margaret Byrne

Francis & Aisling Cunningham

Una Fenelon

19 February 2016.

Wicklow County Council

County Buildings

Wicklow

Dear Sirs,

Ref: Draft County Development Plan 2016 – 2022.

Re: Special Zoning Newtownmtkennedy – HD24 – To provide for low density residential development with associated leisure, tourism and recreational facilities on lands measuring c 28ha Ballinahinch lower, Co. Wicklow as shown on Map 04.01.

We, whose names are listed below are writing to notify you that we are alarmed at the zoning of such a large tract of land outside the town boundary.

- It is completely contrary to good planning and development.
- The land has been zoned against the recommendation of the Wicklow Planning Authority.
- The proposed roads are inadequate. Traffic on Trudder Road, which will inevitably attract vehicles coming from and going back to the South, would be a serious danger, and the access roads are totally insufficient to carry such car movements each day.
- The site is unserviced.
- This development will have a visual impact on a beautiful rural valley.
- There is already adequate land zoned in the Village to cater for the demands of the supply of housing.
- Zoning should be put forward for consideration in the next review of the Newtownmtkennedy development plan and not the County plan.

We strenuously object to the zoning of this land for the reasons outlined above and now ask that the rezoning to this land be reversed.

Yours sincerely,

Frank & Louise Fenelon
"The Seven Acres"
Kilday
Newtownmtkennedy
Co. Wicklow

Paul & Margaret Byrne
"Windfield"
Trudder
Newtownmtkennedy
Co Wicklow

Francis & Aisling Cunningham
"Windy Gable"
Callowhill Lower
Newtownmtkennedy
Co. Wicklow

Una Fenelon
"Fendoo"
Newtownmtkennedy
Co. Wicklow

C39

Leonora Earls

From: Maria Sweeney
Sent: 19 February 2016 15:32
To: Planning - Planning and Development Secretariat
Subject: Fwd: ATTN MYRA PORTER: Campaign for Greystones Dog Park presentation
Attachments: GREYSTONES DOG PARK CAMPAIGN FINAL.pptx

Dear Sir/Madam
Please find below submission for the Wicklow County Development Plan
Many Thanks
Maria

---------- Forwarded message ----------
From: **Maria Sweeney** <[redacted]>
Date: 28 April 2015 at 16:39
Subject: ATTN MYRA PORTER: Campaign for Greystones Dog Park presentation
To: greystonesmd@wicklowcoco.ie

Dear Myra
Please find attached a copy of our presentation for this evening's Council meeting.
Best Regards
Maria

CAMPAIGN FOR GREYSTONES DOG PARK

WHAT IS A DOG PARK?

- An enclosed fenced area
- 1/5 – 2 acres in size
- A regular or irregular shaped piece of land
- Penned area with double access gate

WHAT IS A DOG PARK?

Griffeen Dog Park



St Anne's Dog Park



DOG PARKS IN DUBLIN

- **DUBLIN CITY COUNCIL**
  - (1) St. Annes Park – Clontarf

- **FINGAL COUNCIL**
  - (1) Millennium Park – Blanchardstown
  - (2) St. Catherines Park – Lucan

- **SOUTH DUBLIN COUNCIL**
  - (1) Tymon Park – Tallaght
  - (2) Corkagh Park – Clondalkin
  - (3) Griffeen Valley Park – Lucan

- **DUN LAOGHAIRE/RATHDOWN COUNCIL**
  - (1) Marley Park
  - (2) Shanganagh Park
  - (3) Cabinteely Park
  - (4) Deerpark (near Mt Annville)

Proposed Improvements on Dublin Area Dog Parks;

- Section penned off for smaller dogs
- Health & Safety guidelines and rules erected on site

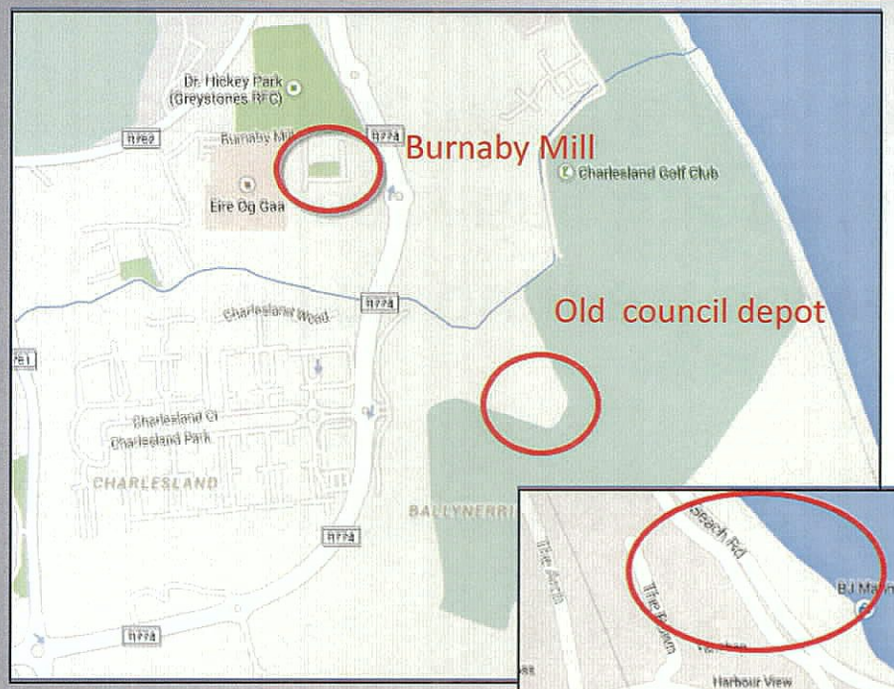
WHY DO WE NEED A DOG PARK?

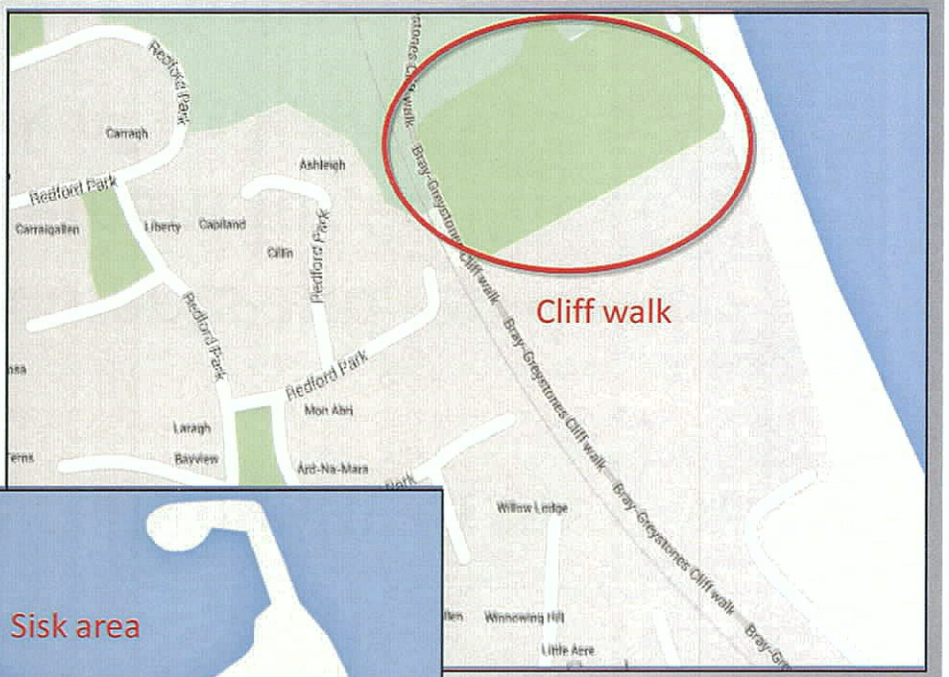
- Huge population of dogs in comparison to other towns
- Exercising and socialising of dogs
- For older or disabled residents and Guide Dogs
- Socialising of dog owners – building better community spirit

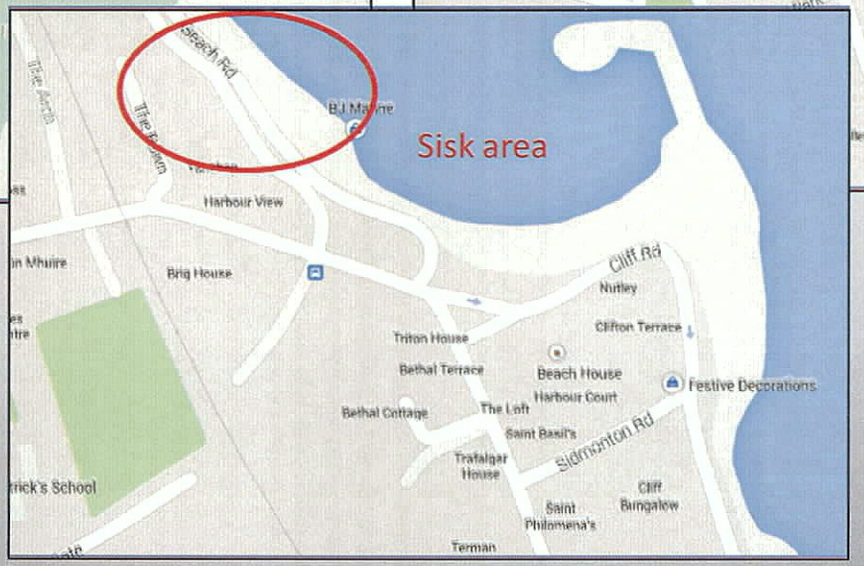
TYPE OF LAND NEEDED

- Any available land of 1.5 – 2 acres
- Derelict or unused wasteland
- Regular or irregular piece of land
- Close to parking facilities if possible

POTENTIAL SITES







WHY IN GREYSTONES?

- Huge population of dog owners who are crying out for a dog park
- Voted 'the most liveable community in the world' in 2008
- Build on our past achievements and reputation by pioneering this requirement for Co Wicklow and offering the first park of its kind
- Help the dog fouling issue – positive peer pressure from responsible dog owners

POTENTIAL SITES



WHY IN GREYSTONES?

- Huge population of dog owners who are crying out for a dog park
- Voted 'the most liveable community in the world' in 2008
- Build on our past achievements and reputation by pioneering this requirement for Co Wicklow and offering the first park of its kind
- Help the dog fouling issue – positive peer pressure from responsible dog owners

CAMPAIGN TO DATE

- Correspondence with past and present Town Council Members, Town Manager and Town Engineer since 2010
- Petition continuously being signed by local supporters
- Facebook Page garnering ongoing support for the campaign
- Participated in 2014 St. Patricks Parade – 'Bark for your Park'
- Willing to raise the funds required to erect fencing, benches and a tap as well as ongoing maintenance of park

PROPOSAL OF A NOTICE OF MOTION – DRAFT MOTION

We call upon Wicklow County Council to provide a dog park for the Greystones area, which will be the first dog park for Wicklow County Council

Tom Fortune _____

Nicola Lawless _____

Grainne McLoughlin _____

Derek Mitchell _____

Gerry Walsh _____

Jennifer Whitmore _____

C35

Leonora Earls

From: Gillian Carey
Sent: 04 February 2016 09:11
To: Planning - Development Plan Review
Subject: Enniskerry Town Plan

Dear sir/ madam,

I am writing to give you my views on the new Enniskerry Development Plan. As a picturesque estate village it is renowned for it's touristic importance on which most of the commercial businesses depend, therefore any development should be sensitive to that.

Action Area Plan 2 at bottom of Kilgarron Hill junction with Forge Road, fig.6.3AA2.This area was refused planning permission after a public meeting convened on behalf of the purchaser of this land a few years back. The reasons have not changed and, in fact, if 156+ houses are built up the hill at Parknaslloge [see fig. 6.2AA 1] the traffic will increase causing further hazard at the bottom of the hill [there are 2 hidden "kinks" on the wall which hide traffic coming down.] As before mentioned knocking down the first of the cottages beside the entrance will make no difference.

I suggest the houses proposed at Parknasillog, fig. 6.2 AA 1, are set back from the road so as not to impinge on the view of visitors travelling up the road and on in to the Wicklow Mountains. This is a stunning part of the area and needs to be treated sensitively.

Car parking - the car park in the Bog Meadow be developed with a foot bridge over the Cookstown River built separate from vehicular traffic and coming in to the car park area of the Powerscourt Arms Hotel with a passage through to the square. If the owner of the said Hotel are looking for planning permission to develop in the car park that should be a proviso. It will enhance the approach to the village centre for visitors. A footbridge over an attractive river is always an enhancement to a village.
The land behind the old Powerscourt National School and Magee's Pharmacy be used as a car park. Several small car parks serve a commercial area better rather than one large one.

With the development of Fassaroe nearby and the expansion of Kilternan to the north in Co. Dublin it is very important that Enniskerry is kept as a rural village/town. The traders depend on the seasonal tourist business for their livelihood. Increasing the number of dwellings in the area does not necessarily increase their business. Is it feasible to build a commercial centre at Kilgarron when there are often premises in the centre of the village unoccupied?

Gillian Carey
Long Acre, Kilmolin, Enniskerry , Co. Wicklow.

C38

C36

SUBMISSION

DRAFT WICKLOW COUNTY DEVELOPMENT PLAN 2016-2022

ZONING OF HOUSE CURTILAGE NEWCASTLE

MICHAEL CAREY



WICKLOW COUNTY COUNCIL
19 FEB 2016
PLANNING DEPT.

February 11th 2016

FRANK O'GALLACHÓIR & ASSOCIATES LTD.

Professional Town Planning Consultants

94 Rathdown Park
Greystones
Co. Wicklow

• T 01 276 2512
• F 01 276 2516
• E info@fogassociates.com
• W www.fogassociates.com

FRANK Ó'GALLACHÓIR
& Associates Ltd.
Planning & Development Consultants

C36

Our Ref: J16/002

County Development Plan Review
Planning Department
Wicklow County Council
County Buildings
Wicklow Town

Date: February 11th 2016

Draft Wicklow County Development Plan Submission -
Rezoning of House Curtilage- Newcastle, Co. Wicklow

Dear Madam,

We act on behalf of Michael Carey of Furze Lodge, Newcastle, County Wicklow. We wish to make a submission regarding the Draft Wicklow County Development Plan 2016-2022 for the consideration of the Council. Our submission follows.

Please contact us if we can be of any further assistance on any of the matters raised. Please address all correspondence to the undersigned.

Yours sincerely,

Frank Ó'Gallachóir

Frank Ó'Gallachóir
Dip. T.C.P., M.Sc., M.I.P.I.

Enc: Development Plan Submission

Company Reg.Nº: 6423170M • VAT Nº: IE 6423170M • Registered Office: 94 Rathdown Park, Greystones, Co.Wicklow • Directors: Frank Ó'Gallachóir, Kate Uí Ghallachóir

DRAFT WICKLOW COUNTY DEVELOPMENT PLAN 2016-2022- SUBMISSION

REZONING OF HOUSE CURTILAGE- NEWCASTLE CO. WICKLOW

MICHAEL CAREY

1. INTRODUCTION & SUBMISSION OBJECTIVE

1.1 Background

Michael Carey is the owner of a family house at Furze Lodge, on the outskirts of Newcastle Village, County Wicklow. Our client has lived in the Newcastle area for his entire life. Indeed the Carey family farm is located east to regional road from Michael Carey's home. This farm is owned and managed by Mr Carey's nephew.

Carey's family house comprises of the house on the road frontage and an entire curtilage of 1.16 ha of land. Our client does not own any other land. Whereas the immediate area surrounding the family house is included within the Development Settlement Boundary of Newcastle and is zoned within the Tertiary Development Zone, the rear of the house is outside of the development boundary and unzoned.

Michael Carey has a son and daughter who do not have a house of their own. Our client simply wishes to provide for the possibility of his son and/or daughter building a family home for themselves, adjacent to the family home.

1.2 Submission Objective

The objective is to include the rear of the Carey house curtilage (back garden) within the Settlement Development Boundary of Newcastle and to zone it within the Tertiary Development Zone i.e. the same way as adjacent lands are zoned. See Figure 1.

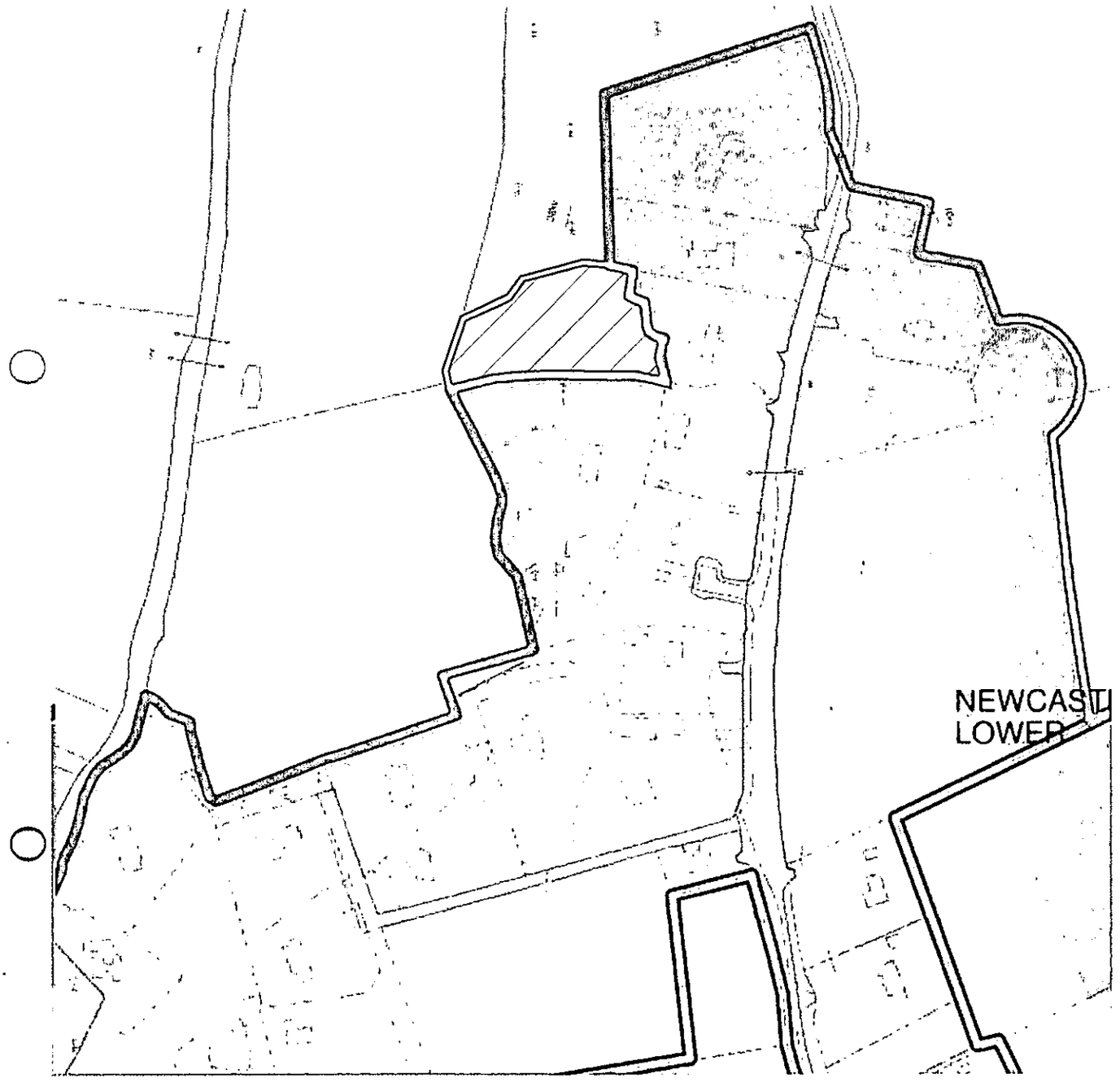
2. SUBMISSION RATIONALE

We believe it is appropriate and sustainable, to include these lands within the Newcastle Settlement Development Boundary as Tertiary Development land for the following reasons.

1. This land is already within the curtilage of the family house and has been for some time.

FRANK Ó'GALLACHÓIR & ASSOCIATES
94 Rathdown Park, Greystones, Co.Wicklow · T: 01 276 2512 · F: 01 276 2516 · E: info@fogassociates.com · www.fogassociates.com

Figure 1 Carey Lands & Newcastle Development Plan



Not to Scale

2. The amount of additional area within the settlement boundary will only amount to circa 0.7 ha of land to the rear of the family house. This will have very limited development potential, as it must be accessed through the existing vehicular access to the family home. Furthermore, as the Newcastle Development Plan restricts development in the Tertiary Zone to low-density single house developments or in some cases to multi-house developments, not exceeding number four units, there is no possibility of significant development.
3. Because of the configuration and access to these lands, there is no possibility of multiple house development or comprehensive residential development on these lands.
4. It is noted that there is existing development on adjacent sites, which is to the rear of the roadside frontage development. Therefore, the inclusion of this land would not represent a precedent for development to the rear of the roadside development.
5. Because of the limited area and the configuration of the additional land there is very limited potential for development. This rezoning will not significantly impact on the population targets for Newcastle village as set out in the Core Strategy of the Wicklow County Development Plan.
6. Furthermore housing occupancy controls ensure that new housing within Newcastle is limited to persons who have been permanently living and/or working in County Wicklow for at least three years prior to the application for planning permission or purchase of the house. This further restricts any development potential on these lands.

3 CONCLUSION

We request the Planning Authority to take this submission into account and to include the rear of the Carey house curtilage (back garden) within the Settlement Development Boundary of Newcastle and to zone it as being within the Tertiary Development Zone i.e. the same way as adjacent lands are zoned.

Regards

Frank Ó'Gallachóir
Dip. T.C.P., M.Sc., M.I.P.I.

FRANK Ó'GALLACHÓIR & ASSOCIATES
94 Rathdown Park, Greystones, Co.Wicklow • T: 01 276 2512 • F: 01 276 2516 • E: info@fogassociates.com • www.fogassociates.com

C37

Leonora Earls

From: Claire Chambers [.....@gmail.com]
Sent: 19 February 2016 17:22
To: Planning - Development Plan Review
Subject: Submission County development plan
Attachments: WCoco development plan submission.docx

Please accept this attached submission.
Claire Chambers

Annacarter House, Roundwood, Co Wicklow, Ireland
Telephone:

Re: DRAFT WICKLOW COUNTY DEVELOPMENT PLAN 2016 – 2022
Roundwood Settlement Plan

A Chara

Thank you for organising the recent consultation meeting in Roundwood. Please see my comments on the Roundwood Settlement Plan.

I had complained on the day that the format was not easy to use compared with the earlier drafts. Hence I have only had time to read small portions of Vol. 1 and as a result have possibly missed picking up some points, that may have been covered in more detail in other chapters.

From Chapter 5

T24 To promote and facilitate improvements to tourism and recreation infrastructure within the County. The Planning Authority will favourably consider proposals for developments that place a particular emphasis on improving traffic flow, sign posting, car parking facilities, service/rest facilities etc, subject to the proper planning and sustainable development of the area, and the objectives of this plan.

While signage is essential, currently there are too many very NRA large signs at the entrance/gateways of small towns/villages. An example is Roundwood at the entrance from Kilmacanogue, there is the gray backside of a a large sign occasionally defaced byfly posters. This is a poor first impression of the village for tourists. Within the village boundaries there are numerous signs (last count on R755with in the village, over 60). The NRA signs that are too big within a village area. The fingerposts are more attractive and just as informative. This proliferation of signs is county wide. The net result is, people become 'sign blind'.

Parking is also an issue county wide, particularly in small towns. The result is small retailers are experiencing problems. Residents and tourists are unable to stop. Residents thus drive to the larger retail units outside their areas. This results in more road traffic, increased fuel consumption leading to increased carbon emmissions. are driving to the larger areas few off road facilities and, eg Aughrim.

From Chapter 6

Level 2	**MAJOR TOWN CENTRES & COUNTY TOWN CENTRES**
	Fingal: Swords, Blanchardstown
	South Dublin: Tallaght, Liffey Valley
	Dun Laoghaire Rathdown: Dun Laoghaire, Dundrum
	Wicklow: **Bray, Wicklow**
	Meath: Navan
	Kildare: Naas / Newbridge, Leixlip (including Collinstown)
Level 3	**TOWN AND/OR DISTRICT CENTRES & SUB COUNTY TOWN CENTRES**
	Dublin City: Finglas, Northside Shopping Centre, Ballyfermot, Rathmines, Crumlin Shopping Centre, Donaghmede Shopping Centre, Omni, Ballymun, Point Village and Poolbeg

Annacarter House, Roundwood, Co Wicklow, Ireland
Telephone: 353-(0)1-2818187
Email: cmchambers.ie@gmail.com

	Fingal: Malahide, Balbriggan, Skerries, Charlestown.
	South Dublin: Adamstown, Crumlin (Ashleaf), Clonburris/Balgaddy, Clondalkin, Fortunestown, Kilnamanagh, Lucan, Rathfarnham
	Dun Laoghaire Rathdown: Stillorgan, Blackrock, Cornelscourt, Nutgrove, Cherrywood.
	Wicklow: **Greystones, Arklow, Blessington, Baltinglass**
	Meath: Dunboyne, Ashbourne, Dunshaughlin, Kells, Trim, Laytown/Bettystown, Enfield.
	Kildare: Celbridge, Kilcock, Maynooth, Kilcullen, Athy, Kildare, Monasterevin, Clane.
Level 4	

The principle of developing larger shopping in major town and District centres is having a disastrous effect on those areas caterorised as level 4 and 5. Shops are closing in these places and the appearance of the lwhat had formerly been a local hub is showing signs of decay with retail units closed, lboraded or shuttered up, eg Rathdrum, Rathdangan, Roundwood.

From Chapter 9

(2) Solar Energy

The principal application of solar energy is use in heating. Therefore this aspect of solar power is addressed in Section 5 to follow. However, solar power can also be used to generate electricity through the use of photovoltaic (PV) cells. Photovoltaic systems use semiconductor materials to convert light into electricity. This technology is widely used in consumer products such as solar calculators, watches or garden lights, and is increasingly used as a cost-effective solution in Ireland for stand-alone applications where a grid connection is too expensive (e.g. parking meters, caravans or remote holiday homes). Solar PV can also be used to provide free solar electricity to houses as well as for commercial and industrial applications. It is now possible to connect solar PV systems to the grid, opening up a new era for solar PV in Ireland.

CCE9 To facilitate the development of solar generated electricity.

CCE10
Topositivelyconsiderallapplicationsfortheinstallationof PVcellsatalllocations,havingdueregard to architectural amenity and heritage.

This is wonderful news but as yet it is not possible for microgenraors of PV electricity to get any benfit for their investment in reducing their carbon footprint.

Roundwood Specific Development Objectives

(1) Along L5077 from junction with R764 to the old schoolhouse.
The road is poorly surfaced and needs to be resurfaced and made safe for both motorists and pedestrians

Junction at R764 /R755
Very unsafe currently as used for u-turn back down the Main Street turning . Mini-roundabout?

Provide footpath along the R755
Along the R755 from Roundwood Caravan Park to the Vartry Ground which links to the Vartry Reservoir Walks

Provide footpath along the R764

Annacarter House, Roundwood, Co Wicklow, Ireland
Telephone: 353-(0)1-2818187
Email: cmchambers.ie@gmail.com

Extend footpath from Kavanagh's Vartry House to Roundwood Park gates

(2) To facilitate the provision of pedestrian and cycling linkages within and between existing and new housing/mixed use development throughout the settlement.

Excellent concept

(3) To provide for a footbridge at Mullinaveigue Bridge on the R755 to connect the Vartry Reservoir Loop walks for pedestrians.

Excellent concept

(4) Due to the inherent risk of leakage from waste water pumping chambers or treatment plants, these installations and any other development that would have a significant risk to the Vartry Reservoir will not be permitted within 200 m if the reservoir shore.

Excellent concept but how much a reality?

(5) All development proposals shall appropriately address the protection of waterways connected to the Vartry Reservoir, which is designated a proposed Natural Heritage Area (pNHA) and is hydrologically linked to protected European sites downstream.

Excellent concept

(6) To maintain views eastwards from the main street of the Vartry Reservoir, development proposals for the lands between the main street and the Reservoir shall be designed to maintain views following evaluation and agreement of the principal vistas.

Excellent concept "Evaluation & agreement" should include "No significant degradation of view" in both cases and should be indicated on the Draft Plan as previously.

(7) To protect established trees within the area.

Excellent concept

(8) To provide for additional car parking and set down area on the lands across the road from the school identified as **(RD1)** on map No.1

Excellent concept

(9) To provide for a town centre extension and a "Village Green" on lands identified as **(RD2)**

on Map No.1 in accordance with the following criteria.

Excellent concept

- A minimum of 500 sqm of commercial floor space shall be provided, particularly in the form of new street / village green facing ground floor retail /retail services / professional services use.
- A Village Green" with a minimum width of 15m with hard and soft landscaping, located between the nearer edge of the footpath of the main street to the eastern edge of the plan boundary at the reservoir buffer. No more than 50%v of the lands within the objective boundary shall be developed prior to the provision of the "Village Green".

Annacarter House, Roundwood, Co Wicklow, Ireland
Telephone: 353-(0)1-2818187
Email: cmchambers.ie@gmail.com

A village green with hard and soft landscaping, located between the nearer edge of the footpath of the main street to the eastern edge of the plan boundary at the reservoir buffer. Corporate some lowkey parking that would not dominate the view. The combination of devlopment and parking should be no more than 50% of the area.

- Vehicular / pedestrian / cycle access / links from the main street to the primary development lands to the south **(RD5)** and provision of pedestrian / cycle links to the secondary development lands to the north **(RD3)** and towards the Reservoir.

Excellent concept

(10) On the lands identified as **(RD5)** on Map 1, to ensure that any development proposals allow for future connectivity to the lands to the north and south (RD2 and RD4).

Excellent concept, particulaly for parking

(11) To provide for secondary development uses on the lands identified as RD3 on Map no.1 and the following shall also be provided:

- Pedestrian and cycle access / link to the **(RD2)** primary Development Area to the south.

Excellent concept .Secondary Development Uses to be defined and indicated by legend on Plan.

- Reserve the existing tree line corner (0.7ha) along the R755 road from development.

Excellent concept,

(12) To provide for secondary development uses on the secondary lands identified as **(RD4)** on Map No.1 and the following shall also be provided:

Secondary Development Uses to be defined and indicated by legend on Plan

- 1.37ha of active open space on the tertiary development lands, these lands shall be levelled, drained and rendered suitable for active open space use. No more than 50% of the secondary development lands shall be developed prior to the provision of the active open space.

Tertiary Development Uses to be defined and indicated by legend on Plan

- Development proposals shall allow for future connectivity to the lands to the north **(RD5).**

Excellent concept.

In addition to the above specific observations please note the following priorities that should be included in the Roundwood Settlement Plan

(1) Traffic Infrastructure

Parking and traffic control is a No.1 safety and infrastructural issue and should be top priority.

(2) Services Infrastructure

Annacarter House, Roundwood, Co Wicklow, Ireland
Telephone: 353-(0)1-2818187
Email: cmchambers.ie@gmail.com

Water treatment plant capacity to be upgraded in advance of any further connections in excess of treatment capacity. Current treatment capacity and estimated capacity requirements and upgrades to 2022 to be confirmed in consultation with Uisce/Irish Water

(3) Tourism / Leisure Infrastructure

The Roundwood Settlement area to be officially identified as far as possible as an important "Gateway" to the uplands for seasonal tourists and year round walkers.

Yours sincerely

Claire Chambers

C38

Leonora Earls

From: eugene@alphaplandesign.com
Sent: 19 February 2016 12:44
To: Planning - Planning and Development Secretariat
Subject: zoning proposeal at ballinaclash
Attachments: clarke seamus ballinaclash zoning two.pdf

Good afternoon
Enclosed please find a zoning proposal for Seamus Clarke at Ballinaclash Village for consideration for inclusion in the 2016-2022 CDP

Thank you

Eugene Copeland

Alphaplan Design
Suite 14, Block 1, Broomhall Business Park
Rathnew, County Wicklow.
Ph: 0404 64123
Fax: 0404 64164
Mobile: 086 2461269
www.AlphaplanDesign.com

ALPHAPLAN DESIGN

ARCHITECTURAL SERVICES

Suite 14, Block 1, Broomhall Business Park, Rathnew, Co. Wicklow
Tel : (0404) 64123 (086) 2461269
E Mail: eugene@alphaplandesign.com
Website: www.alphaplandesign.com
Reg. Vat. No. IE3212037H

RE: Zoning at Ballinclash, Co. Wicklow – Large Village

Client: Seamus and Mary Clarke

Dear Sir / Madam,

Enclosed please find a map of the settlement boundaries for Ballinaclash Village as proposed in the new County Development Plan 2016 – 2022. Please note that the plot in the ownership of Seamus and Mary Clarke, Ballinaclash, Co. Wicklow, is coloured pink in this map. The area of the plot on the outskirts of the village is approx 1.5 acres.

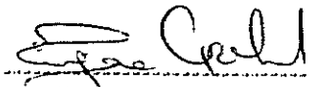
Please note that there is a small area of Mr and Mrs Clarkes registered land contained within the settlement boundary already which splits the field, and I wish to have the remainder of this field area extended to include the for residential zoning as indicated hereon coloured pink.

It is proposed that this land could be used for medium density residential use as it is located in a serviceable area on the edge of the village and on the main approach to the Village from the east to west of the county. The land is connectable to the main drainage and water supply to the village. The road network in this area is suitable for this type of residential development with a county regional road to NRA standards.

The site is approximately 1.5 acres and it is proposed that this land can be developed in an orderly single development fashion of say 6-8 dwellings and will complement the entrance to the Village while providing important living accommodation with appropriately designed dwellings as a form of integration for the future development of Ballinaclash.

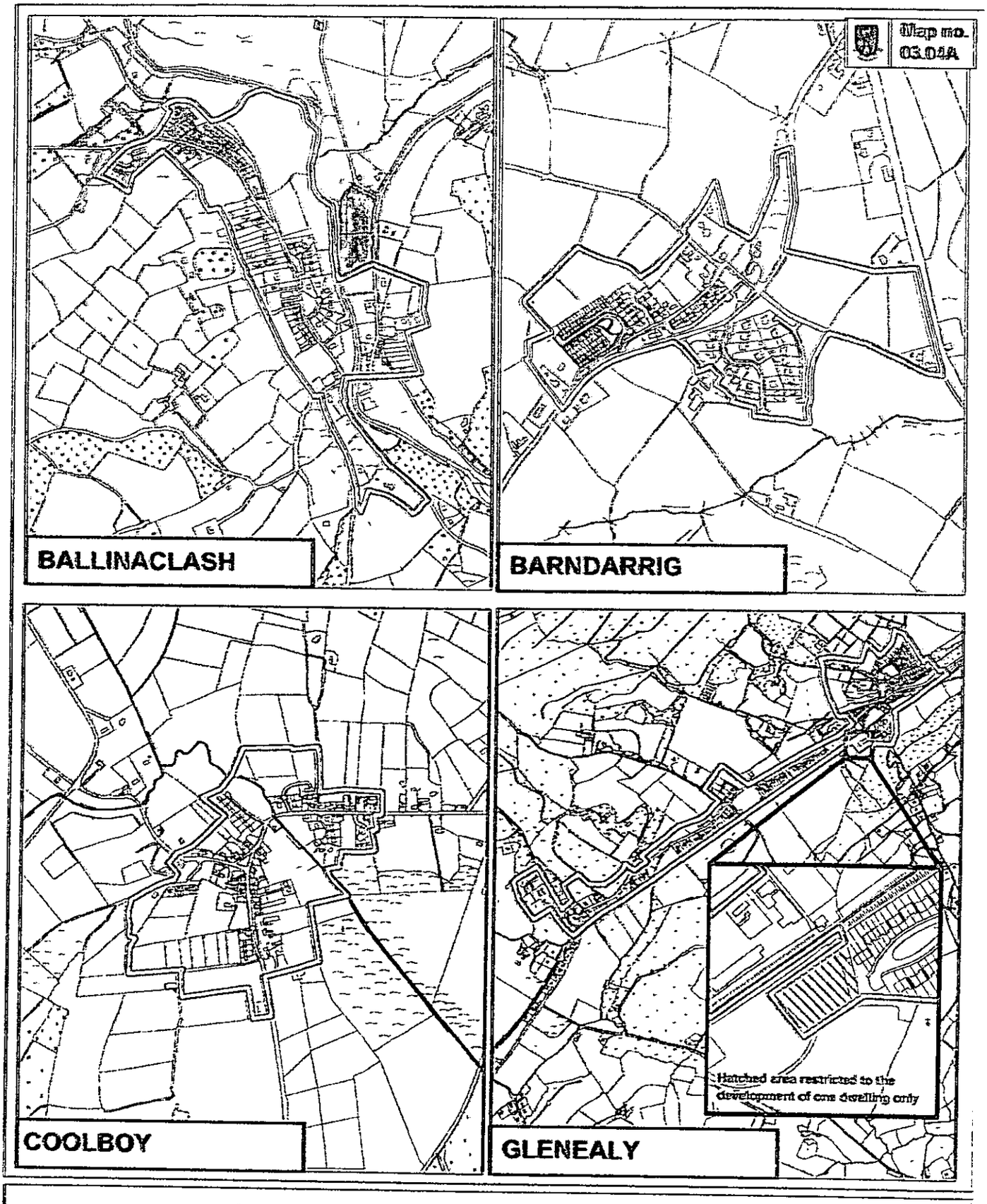
Please keep me informed of the status of this submission.

Yours sincerely,



EUGENE COPELAND
Architect / Project Manager

19th February 2016



Settlement Boundaries
Large Villages

DRAFT WICKLOW COUNTY DEVELOPMENT PLAN 2016-2022

SETTLEMENT BOUNDARIES

Wicklow County Council
Planning Department

Maps Not To Scale

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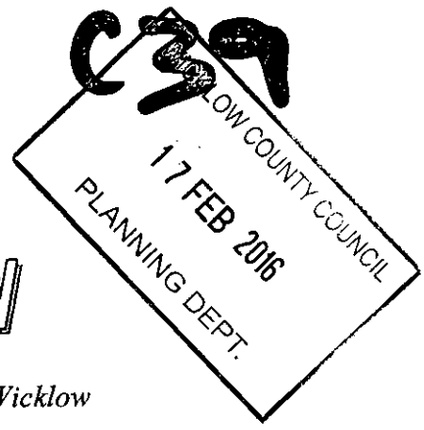


ALPHAPLAN DESIGN

ARCHITECTURAL SERVICES

Suite 14, Block 1, Broomhall Business Park, Rathnew, Co. Wicklow
Tel : (0404) 64123 (086) 2461269
E Mail: eugene@alphaplandesign.com
Website: www.alphaplandesign.com
Reg. Vat. No. IE3212037H

RE: Zoning at Ballinclash, Co. Wicklow – Large Village

Client: Seamus and Mary Clarke

Dear Sir / Madam,

Enclosed please find a map of the settlement boundaries for Ballinaclash Village as proposed in the new County Development Plan 2016 – 2022. Enclosed also please find a copy of my clients Seamus and Mary Clarkes land registry boundaries to their land in this area.

Please note that there is a small area of Mr and Mrs Clarkes land contained within the settlement boundary, indicated herein coloured yellow, and I wish to have this area extended to include the extra area for residential zoning as indicated hereon coloured blue.

It is proposed that this land could be used for low density residential use as it is located in a serviceable area on the edge of the village and on the main approach to the Village from the east to west of the county. The land is connectable to the main drainage and water supply to the village. The road network in this area is suitable for this type of residential development with a county regional road to NRA standards.

I note it is policy for the planning authority to allow for private site development for local people to build single dwellings at locations at the edges of towns and villages. This is the land most suited to this type of development which will help to take the pressure off rural ribbon development. Please note that it is not being proposed that this land is for high density development.

The site is approximately 5.25 acres and it is proposed that this land can be developed in an orderly fashion and will complement the entrance to the Village while providing important living accommodation with appropriate space between dwellings as a form of gradual integration for the future development of Ballinaclash.

Please keep me informed of the status of this submission.

Yours sincerely,



EUGENE COPELAND
Architect / Project Manager

17th February 2016

Revised 2002
Levelled

Rural PLACE Map



ITM CENTRE PT COORDS
716984,685306

DESCRIPTION

MAP SHEETS
1:2500
4184-A 4184-C

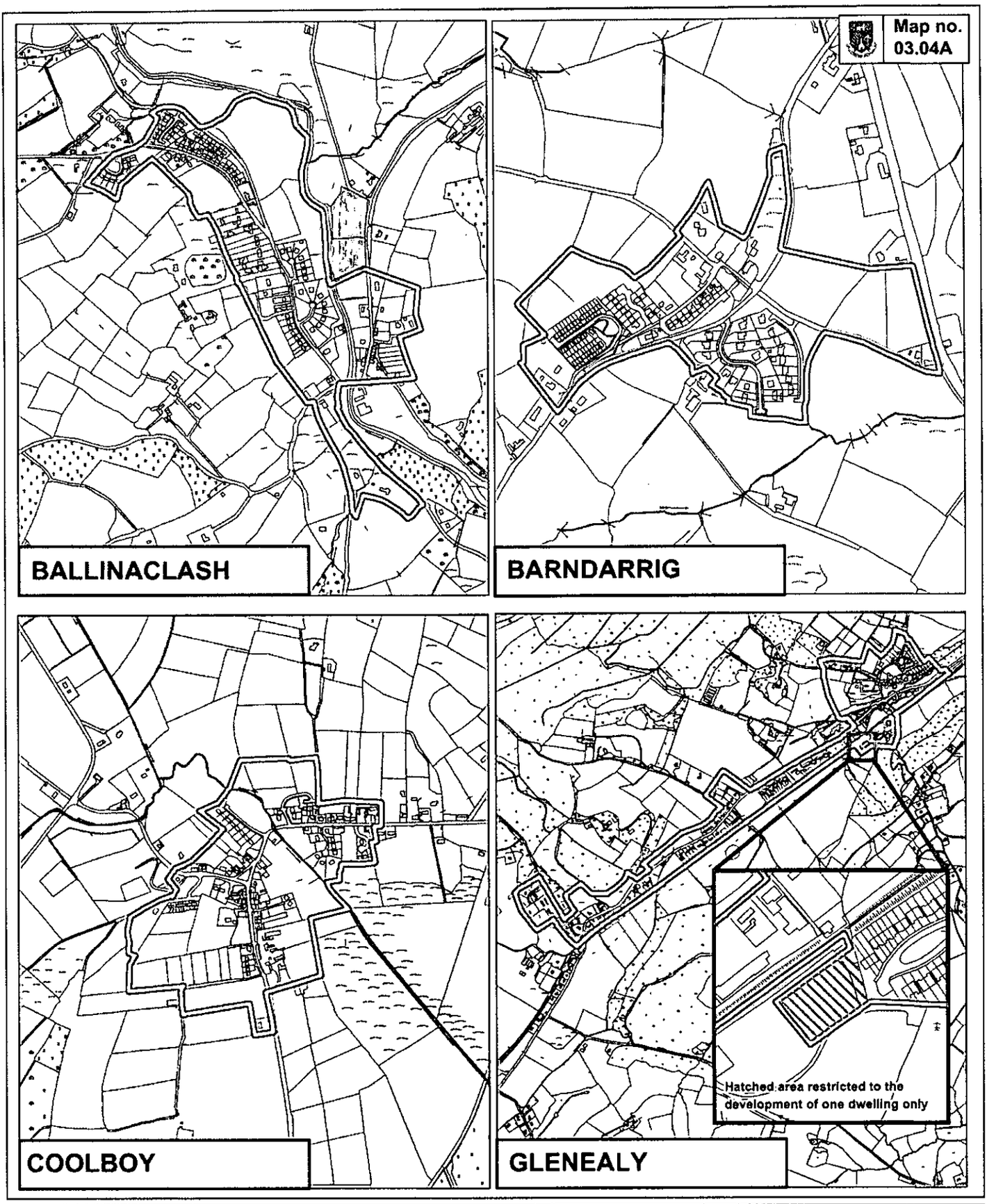
A2
ORDNANCE SURVEY IRELAND

Scale:- 1:2,500
Map:- 1:2,500

0 40 80 120 160 200 Metres
0 150 300 450 600 750 Feet

Plot Ref. No. 1068132_3_2
Plot Date 13-DEC-2005

N



Settlement Boundaries
Large Villages

DRAFT WICKLOW COUNTY DEVELOPMENT PLAN 2016-2022

SETTLEMENT BOUNDARIES

Wicklow County Council
Planning Department

Maps Not To Scale

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2015/35/CCMA/Wicklow County Council

C40

RECEPTION
- 2 FEB 2016
Time.....

Planning Dept.

Wicklow Co. Council,

County Offices,

Wicklow

01.02.16

Kilcullen St.

Dunlavin

Co. Wicklow

Re: Proposed Dunlavin Town Plan 2016 -2022

Dear Planner,

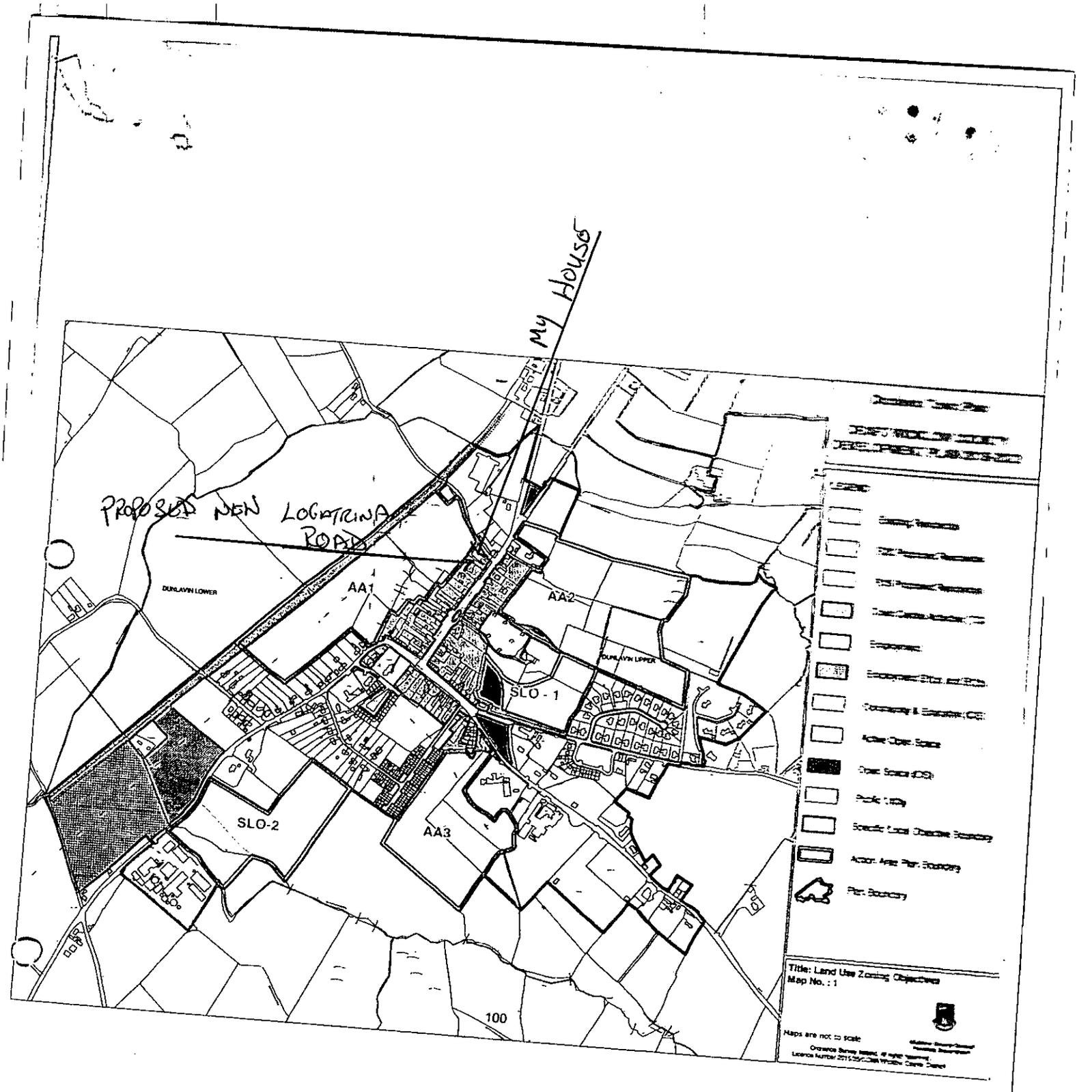
I have viewed the plan in Dunlavin Market House with great interest. While it is encouraging to develop our pretty town and enhance it I have several reservations. I wish to make the following comments:

- The proposed road which I have marked on the accompanying map that will be coming from Logatryna along the back of my garden and continuing up along the side of my house to adjoin Kilcullen St. This road will seriously interfere with my privacy it will also increase the noise level due to the increase of traffic when the proposed houses are built.
- I am also concerned about the level of the proposed road as it will interfere with both my view and reduce the light coming into my property. I also wish to note that my kitchen and sitting room are situated on the same side as this proposed new road.
- I wish to ask what type of boundary is proposed to separate the road from my property and what height will this boundary be?
- Will this road have a pedestrian footpath and if so will this path be on the side of my boundary or on the opposite side?

Yours faithfully

Gladys Coleborn

Gladys Coleborn


MY HOUSE
PROPOSED NEW LOCATRINA ROAD
DUNLAVIN LOWER
DUNLAVIN UPPER
AA1
AA2
AA3
SLO - 1
SLO-2
100
Title: Land Use Zoning Objectives
Map No. : 1
Maps are not to scale

C91

Leonora Earls

From: hendrik van der Kamp
Sent: 07 February 2016 19:25
To: Planning - Development Plan Review
Subject: Submission draft county development plan
Attachments: Submission draft Wicklow County DP.doc

Dear Sir or Madam, Please find attached a submission to the draft Wicklow County Development Plan 2016-2022. The submission is made on behalf of Mr Eamonn Coleman. I would appreciate an acknowledgement of receipt of the submission. Thank you, Hendrik van der Kamp.

Hendrik W van der Kamp, MScEng, FIPI, MIEI
Town Planner
1, Woodstown Court
Knocklyon
Dublin 16
Tel: *E-mail:*

Director of Services
Planning Department
Wicklow County Council
Station Road
Wicklow Town

by e-mail, 7 February 2016

Submission regarding the Draft Wicklow County Development Plan 2016-2022. The submission is made on behalf of Mr Eamonn Coleman.

Introduction

This submission is in response to the invitation by Wicklow County Council to make submissions regarding the draft County Development Plan. This submission addresses the Level 5 Town Plan for Enniskerry and within that Plan the proposed Action Area Plan 2.

General

The zoning objectives for the action area plan are supported and provide a welcome response to the goal that in the new County Development Plan Enniskerry will be kept a compact settlement retaining its existing character and providing high quality new development and a high quality public realm.

To retain Enniskerry a compact town, using existing vacant land opportunities for development rather than extend the town out further using new greenfield land, would facilitate not only local journeys on foot or by bicycle but also ensure that future residents would be in walking distance from the single public transport facility that the town has in the form of the bus service. The proposed action area plan will achieve this by providing housing units in the centre of the existing town.

The proposed action area plan is also welcomed because it facilitates development of a range of house types, sizes and tenures in order to meet the differing needs of all in society and to promote balanced communities.

The explicit objectives of Wicklow County Council to improve the public realm, improve pedestrian links and connections between the core area and the neighbouring amenity areas, maximising existing amenity routes, and the protection of the natural and built assets of the town, are all achieved in this modest action area plan.

Specific Provisions of the Action Area Plan

It is noted that the draft Development Plan sets out a number of detailed and explicit design parameters that must be achieved in the action area plan. As my client ultimately proposes to submit a planning application for the development of the housing units that are envisaged under the policies of this action area plan, it is considered important to respond to these design parameters.

Heights of the Proposed Houses

Under the provisions of the draft County Development Plan, the finished floor level of any development shall not exceed 90.00mOD while the top ridge height of any structure shall not exceed 98.00mOD.[1] My client agrees with these parameters which will ensure that any development on these lands will not be visually obtrusive as seen from the surrounding area given the steeply sloping nature of the land to the rear of the future houses.

Footprint of the Residential Area

Under the provisions of the draft County Development Plan a maximum of 28 dwelling units on an area of no more than 0.7 hectare of the total 2.5 hectares, shall be achieved while it is noted that the remainder of the site is zoned open space and shall be retained in agricultural use.[2] While the limits to the overall amount of development are acceptable, it is noted that the action area plan provides for a further ca. 1.8 hectare of land that shall not be developed for housing. It is submitted that the development plan should be less specific in the amount of land that can be used for the proposed housing. While the limitation of 28 units is appropriate, the detailed design of the action area plan may suggest a greater area than 0.7 hectare if public open space to serve the dwelling units would be included. It may be preferable to set a limit on the number of dwelling units. In combination with the maximum heights of the proposed dwellings, it follows that the higher parts of the site cannot be used for development while the area with mature trees may well be appropriate for use as public open space to serve the residents of the new houses, rather than agriculture. It is therefore requested that the relevant bullet points are amended as shown below:

- ~~***A maximum of 0.7ha of the action area shall be developed for residential.***~~ *The site shall be developed at 'town centre' type densities (i.e 40 units/ha max), with a maximum of 28 residential units and shall generally comprise terraces and courtyards of dwellings, as opposed to detached format housing; Commercial development is not permitted within the action area.*

- *The remainder of the site, zoned open space, is not designated for a particular purpose either housing or amenity use), shall be retained in its current agricultural use* ***or public open space to serve the new residential development.***

[1] *DRAFT Wicklow County Development Plan 2016-2022*, Wicklow County Council, p. 111.

[2] *DRAFT Wicklow County Development Plan 2016-2022*, Wicklow County Council, p. 111.

Action Area Plan Process

It is noted that the draft County Development Plan states the following in relation to the action area plans: ..." *Action Areas are to be the subject of comprehensive (not piecemeal) integrated schemes of development that allow for the sustainable, phased and managed development of the Action Area during the plan period.*"[3]

In relation to action area plan 2 in Enniskerry Town Plan, it should be noted that a previous planning application was made for these lands (pl. ref. 09/1309). My client is satisfied that a single planning application can be made for the total lands covered by the action area plan 2 and that such an application will comply with all the design parameters listed (subject to the modifications proposed). In these circumstances it is suggested that the action area plan can be prepared by the applicant as a background document to accompany the planning application. It is therefore requested that an additional bullet point is included as shown below:

- ***Having regard to the small size of the action area and the explicit design parameters, a single planning application will be considered subject to inclusion of a draft action area plan that complies with the requirements set out in this development plan.***

Conclusion

In conclusion, the following amendments to the text on page 111 of the draft development plan written statement are proposed:

Fourth bullet point:

Omission of the first sentence:
"A maximum of 0.7ha of the action area shall be developed for residential."

Addition of the following at the end:
..."or public open space to serve the new residential development."

Add additional bullet point:

"Having regard to the small size of the action area and the explicit design parameters, a single planning application will be considered subject to inclusion of a draft action area plan that complies with the requirements set out in this development plan."

Please direct all future correspondence to the undersigned.

Yours sincerely,

Hendrik W van der Kamp.

[3] *DRAFT Wicklow County Development Plan 2016-2022*, Wicklow County Council, p. 13.

C42

Leonora Earls

From: Roisin Hanley
Sent: 01 February 2016 17:23
To: Planning - Development Plan Review
Subject: Submission to Draft Development plan 2016 bridge at fassaroe Roundabout
Attachments: Close up.pdf; Context.pdf; submission to County Development Plan 2016 -2022.pdf

Dear Sir Madam
please find enclosed our submission for a bridge at Fassaroe Roundabout across the Dargle.

yours sincerely
Roisin

Roisin Hanley B.Arch M.U.B.C. R.I.A.I. R.I.B.A. C.E.D.R Dip Arb.
R.I.A.I Conservation Architect Grade 1
R.I.B.A Specialist Conservation Architect (SCA)
Roisin Hanley Architects
Lisieux House
5 Charlemont Terrace
Crofton Road
Dun Laoghaire
TEL:
Mob:
FAX:

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ROISIN HANLEY
ARCHITECTS LIMITED
"Lisieux House", 5 Charlemont Terrace, Dun Laoghaire, Co Dublin
Tel No (01) [redacted]

County Development Plan Review,
Planning Department,
Wicklow County Council,
Station Road
Wicklow Town 01/02/2016

RE: Inclusion of proposed bridge at Fassaroe Roundabout across the River Dargle In the draft development Plan 2016- 2022.

Dear Sir /Madam

On behalf of my client Mr Liam Collins who owns lands at Killarney Glen, Herbert Road Bray. We actively support the Flood Defence Work that is been carried out at the Dargle River.

Previously there was a bridge that was blown away by Hurricane Charlie. This was located at .River Vale apartments. There is still a spring ponit at this connection.

We strongly support the reinstatment of a bridge to replace the connection across the river, With regard to the roundabout at Fassaroe there has been a spur of road left between apartments and offices at the roundabout and we strongly support the inclusion of a bridge in the County Developement Plan 2016 -2022

- Fassaroe

there is access off the main road and space left at the round about between apartments and offices
see enclosed satelite image.

The proposed reinstatement of a bridge would reconnect the public across the river and by reconnecting at the Fassaroe roundabout it would allow permeability across the Dargle River

We enclose a satelite image
of the proposed bridge location at Fassaroe roundabout
and the propopsed bridge location in context

Yours sincerely

Roisin Hanley B.Arch MUBC RIAI RIBA CEDR dip Arb.
RIAI Conservation Architecture Grade 1
RIBA Specialist Conservation Architect

ROISIN HANLEY
ARCHITECTS LIMITED

"Lisieux House", 5 Charlemont Terrace, Dun Laoghaire, Co. Dublin
Tel No (01) 2020000 (01) 230 1495 email [illegible]



Location of proposed bridge



Location of proposed bridge

ROISIN HANLEY
ARCHITECTS LIMITED
"Lisieux House", 5 Charlemont Terrace, Dun Laoghaire, Co Dublin
Tel No (01) 2020804

County Development Plan Review,
Planning Department,
Wicklow County Council,
Station Road
Wicklow Town 01/02/2016

RE: Inclusion of proposed bridge at Fassaroe Roundabout across the River Dargle In the draft development Plan 2016- 2022.

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of the proposed bridge location at Fassaroe roundabout
and the propopsed bridge location in context

Yours sincerely

Roisin Hanley B.Arch MUBC RIAI RIBA CEDR dip Arb.
RIAI Conservation Architecture Grade 1
RIBA Specialist Conservation Architect

WICKLOW COUNTY COUNCIL
03 FEB 2016
PLANNING DEPT.
RECEPTION
-3 FEB 2016
Time.....



Location of proposed bridge



Location of proposed bridge

C43

Leonora Earls

From: Sine Kelly |
Sent: 19 February 2016 14:10
To: Planning - Development Plan Review
Subject: Submission on Draft Wicklow County Development Plan, 2016-2022
Attachments: Final Combin Properties' Submission 19-02-16.pdf

Importance: High

Dear Sir / Madam

Please find attached a submission in respect of the *Draft Wicklow County Development Plan, 2016-2022* prepared on behalf of Combin Properties Limited in respect of lands measuring 2.3ha located to the south of Carnew Primary Care Centre at Gorey Road, Carnew, Co. Wicklow.

We trust that the submission will be taken into consideration in the preparation of any proposed material alterations to the *Draft Development Plan*.

Should the Local Authority require any further information or clarification on any of the information included in the submission, please do not hesitate to contact me.

I would appreciate it if you could send me an email acknowledging receipt of this Submission.

Kind regards

Síne

Síne Kelly
Associate

TOM PHILLIPS ASSOCIATES
PLANNING FOR THE FUTURE

Contact
80 Harcourt Street
Dublin 2
D02 F449
T +353 1 478 6055
F +353 1 478 6054
Mob.: 087 274 0125

w www.tpa.ie
e info@tpa.ie

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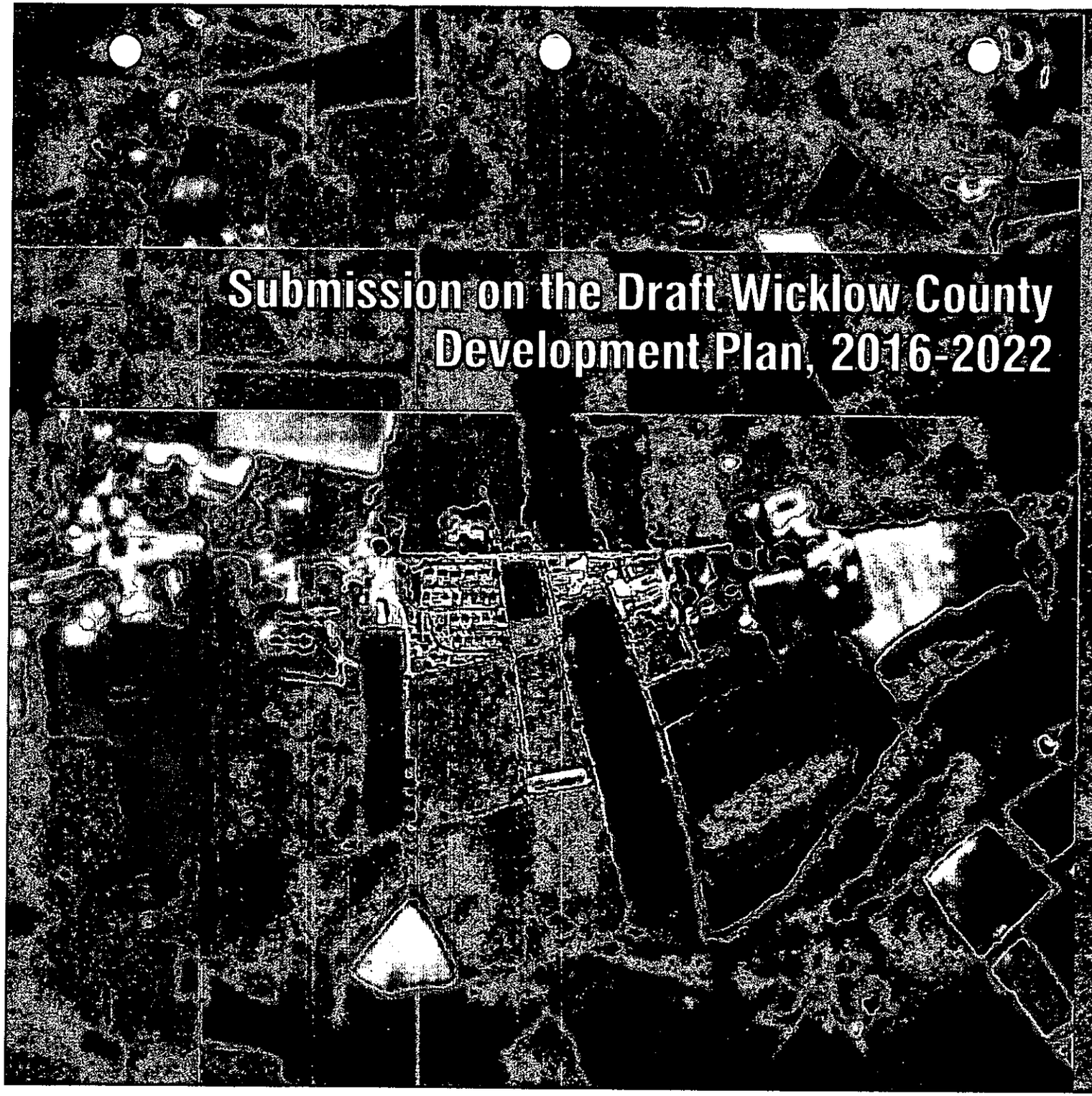


Submission on the Draft Wicklow County Development Plan, 2016-2022

TOM PHILLIPS ASSOCIATES
PLANNING FOR THE FUTURE

In respect of:

Lands measuring c. 2.3ha located to the south of the Carnew Primary Care Centre at Gorey Road, Carnew, Co. Wicklow

Client:

Combin Properties Ltd
Coolladea House
Laurel Lane
Baltigon
Co Cork

by

Tom Phillips + Associates
80 Harcourt Street
Dublin 2
D02 F449

19 February 2016

TABLE OF CONTENTS

1.0 INTRODUCTION
1.1 Submission Seeks the Alterations to the Draft Development Plan's Designations for the Lands
1.2 Executive Summary – Overview of Key Points Raised in this Submission
1.3 Current Development Plan Policy
1.3.1 Land Use Zoning under Current *Development Plan*
1.3.2 Proposed Land Use Zoning under *Draft Development Plan*
1.4 Proposed Required Amendments to *Draft Development Plan* Policy
1.4.1 Other Associated Alterations Required to Carnew Town Plan

2.0 SITE LOCATION AND URBAN DESCRIPTION
2.1 Site Context
2.1.1 Carnew PCC is an Important Addition to Improving the Health Services Provide in Carnew

3.0 TOWN PLANNING CASE FOR DESIGNATIONS SOUGHT IN AMENDMENTS TO THE *DRAFT DEVELOPMENT PLAN*
3.1 Appropriateness of 'C' Zoning for the Uses Proposed
3.1 Nursing Home and Assisted Living Use
3.2 Increases in Life Expectancy and Recent Population Trends Indicate Existing and Future Requirements for Residential Long-Term Care
3.2.1 Significant Population Increases in Persons Aged 65 and Over, Particularly in Wicklow
3.2.2 Projected Population Increases in Those Aged 65 and Over will Likely be Significant
3.2.3 Mortality Rates Continuing to Improve
3.2.4 Clear Current and Future Need Predicted for Appropriate Care Facilities, Particularly for the Aged
3.3 Suitability of the Lands for Nursing Home and Assisted Living – Synergy with PCC
3.3.1 Support from the HSE
3.4 Importance of Nursing Home and Assisted Living Provision in Current Statutory Planning Policy
3.4.1 Proposed Required Alterations to the Statutory Designations Complies with *Draft Development Plan* Policy
3.5 Conclusion – Appropriate Zoning Proposed

4.0 CONCLUSION

County Development Plan Review
Planning Department
Wicklow County Council
Station Road
Wicklow Town
Co. Wicklow

Friday, 19th February 2016
[By Email.]

Dear Sir / Madam

RE: SUBMISSION ON THE *DRAFT WICKLOW COUNTY DEVELOPMENT PLAN, 2016-2022* IN RESPECT OF LANDS MEASURING 2.3HA LOCATED TO THE SOUTH OF CARNEW PRIMARY CARE CENTRE, AT GOREY ROAD, CARNEW, CO. WICKLOW

1.0 INTRODUCTION

1.1 Submission Seeks the Alterations to the Draft Development Plan's Designations for the Lands

Cambin Properties Limited[1] has retained Tom Phillips + Associates, Town Planning Consultants[2], to make a submission in respect of the *Draft Wicklow County Development Plan, 2016-2022* (*Draft Development Plan*).

Cambin Properties Limited's lands, measuring some 2.3ha, are located off the Gorey Road (the R725) in the east of Carnew. The construction of a Primary Care Centre is currently nearing completion directly north of the lands.

The northern element of the site (circa 0.37ha) is zoned Proposed Residential (R1) in the current *Wicklow County Development Plan, 2010-2016*, which is proposed to change to 'Strategic Land Bank' in the *Draft Development Plan*. The southern element of the site (circa 1.93ha) is located outside the indicative town boundary and is unzoned. (See Figures 1.1 to 1.3.)

1.2 Executive Summary – Overview of Key Points Raised in this Submission

In summary, this Submission seeks the following alterations to the lands' proposed statutory designations in the Carnew Town Plan forming part of the *Draft Development Plan*, as follows:

1. Extend the Carnew indicative town boundary to include the southern element of the site;
2. Rezone the northern element of the site from 'Strategic Land Bank' to 'C' 'Community/Educational/Institutional';
3. Zone the southern element of the site from unzoned 'white' lands to 'C' 'Community/Educational/Institutional'; and
4. Attach a Specific Local Objective (SLO) in the form of SLO4 on the entire lands to support the specific development of a nursing home and assisted living units.

In addition, alterations are required to the *Draft Development Plan* to reflect these alterations, including the insertion of text for SLO4, and these are described in further detail in Section 1.4 below.

It is our opinion that the zoning of these lands to 'C', coupled with the insertion of a Specific Local Objective, will facilitate the specific development of a nursing home and assisted living units on the site, which have the distinct advantage over other similarly-zoned sites in the town of being directly adjacent the new Carnew Primary Care Centre.

Such a rezoning would be fully in accordance with *Draft Development Plan* policy which aims to support the further provision of social infrastructure throughout the County, which includes nursing homes and other similar-type uses. (See Section 3.0 below.)

Furthermore, the alterations would present the opportunity to plan for residential care requirements that are anticipated to be required in the short-to-medium term, having regard to current population growth rates and the ongoing improvements in mortality rates. The alterations to the *Draft Development Plan* proposed in this Submission would ensure that an appropriate plan is put in place by the Local Authority to facilitate the provision of additional nursing home beds to serve the Carnew area and the County in general.

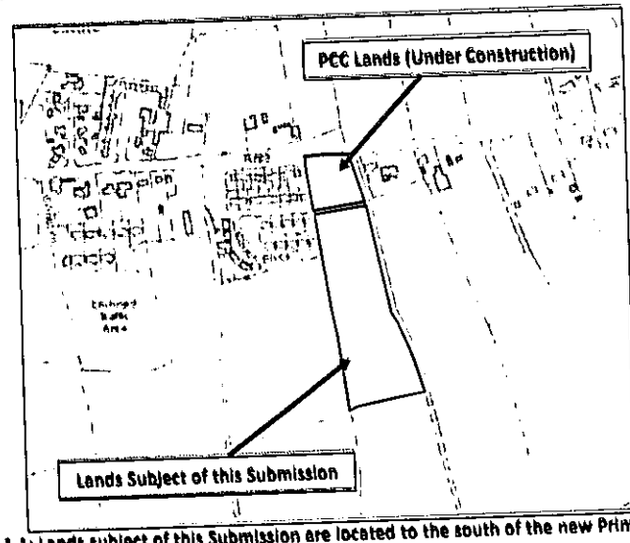


Figure 1.1: Lands subject of this Submission are located to the south of the new Primary Care Centre (PCC), the construction of which is nearing completion.
Source: www.myplan.ie, with annotation by Tom Phillips + Associates, February 2016 (TPA OS Licence No. AR0008616).

[1] Coolfadda House, Laurel Lane, Bandon, Co. Cork.
[2] 80 Harcourt Street, Dublin 2, D02 F449.

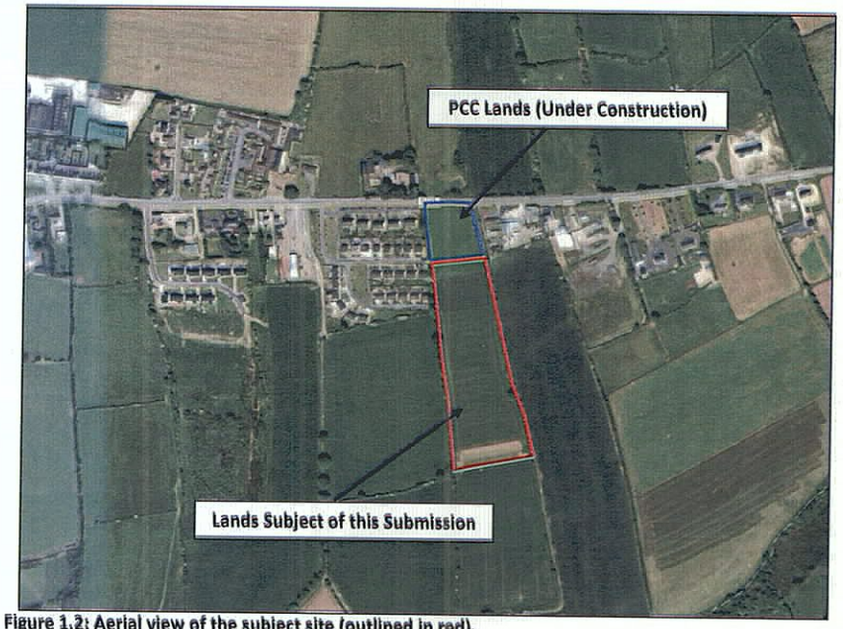


Figure 1.2: Aerial view of the subject site (outlined in red).
Source: Google Maps; cropped and annotated by Tom Phillips + Associates; 2016.

1.3 Current Development Plan Policy

1.3.1 Land Use Zoning under Current *Development Plan*

The lands subject of this Submission are partially located within the indicative town boundary of Carnew, as illustrated in the *Carnew Town Plan*, which forms part of Volume 3 Town and District Plans of the current 2010-2016 *Development Plan*.

The northern element of the site (circa 0.37ha) is zoned Proposed Residential (R1), with the southern element of the site (circa 1.93ha) being located outside the Town Boundary and is unzoned.

It is our opinion that the rezoning of the R1 lands to C is more compatible having regard to the new PCC directly north of the lands. In addition it is our opinion that the zoning of the southern element of the lands to C, with a Specific Local Objective (SLO) to provide nursing home and assisted living units on the lands will provide much needed long term residential care for the elderly and young adults with care needs. This would present significant opportunities for the proposed services to avail of the facilities provided by the PCC. This is discussed in greater detail in Section 3.0 below.

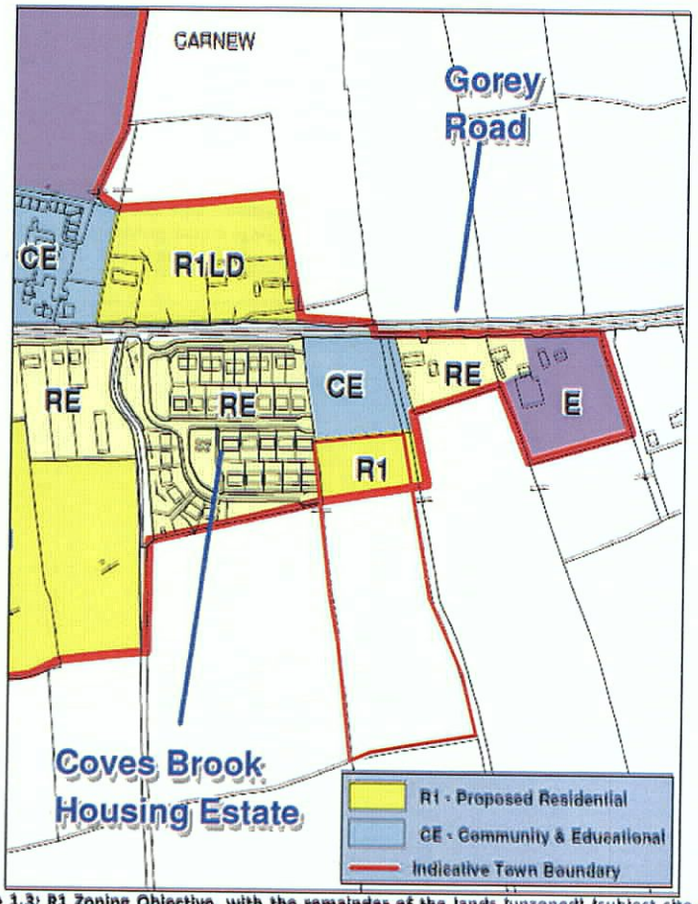


Figure 1.3: R1 Zoning Objective, with the remainder of the lands 'unzoned' (subject site outlined in red).
Source: *Wicklow County Development Plan 2010-2016*; annotated by Tom Phillips + Associates, 2016.

1.3.2 Proposed Land Use Zoning under *Draft Development Plan*

The Carnew Town Plan is located under Section 4 of Volume 2 Town Plans and Settlement Plans in the *Draft Development Plan*.

The *Draft Development Plan* proposes to rezone the northern section of the site from 'Proposed Residential' (R1) to 'Strategic Land Bank' (SLB) – '*To provide a land bank for future development of the settlement after the lifetime of this plan, if and when the need arises*'. (See Figure 1.4.)

The *Draft County Development Plan* describes Strategic Land Banks as:

> *'Policy CAR1: To reserve lands for future development* ***beyond the lifetime of the plan in the form of a 'Strategic Land Reserve'****. These are lands that are identified as being within the potential built envelope of the settlement with regard to* ***proximity and accessibility to infrastructure****. However these lands are* ***not suitable or necessary for development during the lifetime of this plan and may only be considered for detailed zoning and development after 2022****. Any development proposals within the lifetime of the plan will be considered under the Wicklow County Development Plan rural objectives.'* (Our emphasis.)

The *Draft Development Plan* states that potentially 20 No. units could be achieved on this section of the site. However, as outlined above, the *Draft Development Plan* states the Planning Authority will not permit its detailed zoning or development until after 2022.

The southern element of the site remains unzoned in the *Draft Development Plan*.

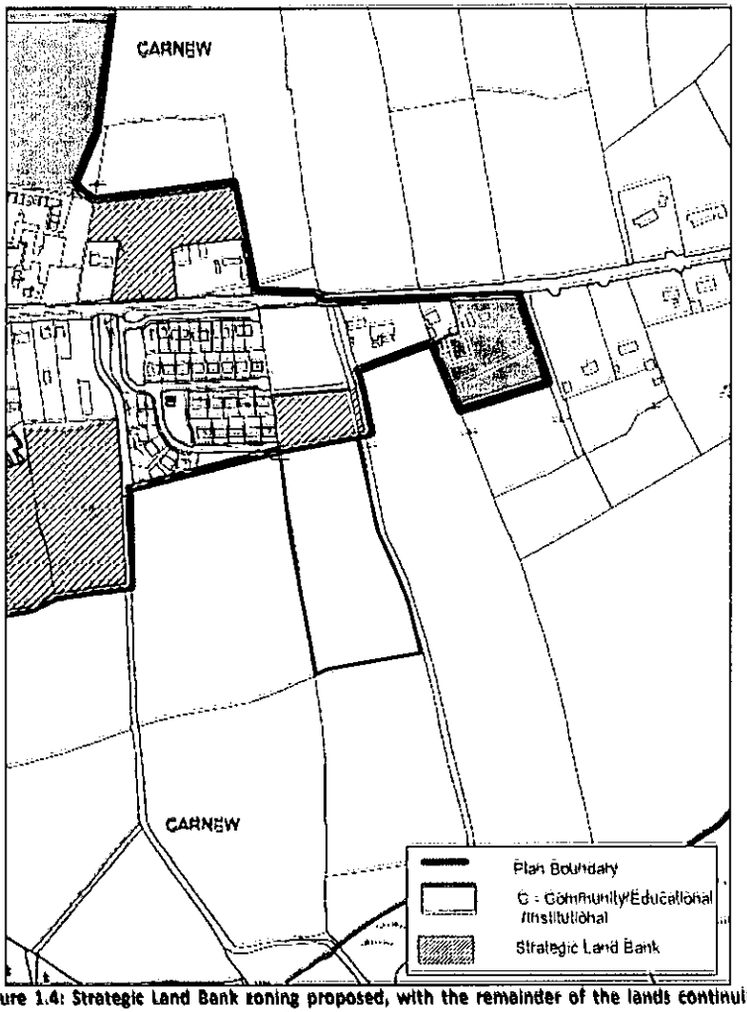


Figure 1.4: Strategic Land Bank zoning proposed, with the remainder of the lands continuing to be 'unzoned' (subject site outlined in red).
Source: *Carnew Town Plan*, forming part of the *Draft Wicklow County Development Plan 2016-2022*; annotated by Tom Phillips + Associates, 2016.

1.4 Proposed Required Amendments to *Draft Development Plan* Policy

To reiterate, this Submission seeks the following alterations to the lands' proposed designations in the Carnew Town Plan forming part of the *Draft Development Plan*, as follows:

1 Extend the Carnew indicative town boundary to include the southern element of the site;

2 Rezone the northern element of the site from 'Strategic Land Bank' to 'C' 'Community/Educational/Institutional';

3 Zone the southern element of the site from unzoned 'white' lands to 'C' 'Community/Educational/Institutional'; and

4 Attach a Specific Local Objective (SLO) in the form of SLO4 on the entire lands to support the specific development of a nursing home and assisted living units.

(We note that Map No. 1 of the Carnew Town Plan refers to 'C' zoning - 'Community/Educational/Institutional', whereas the written text refers to 'CE' zoning – 'Community and Education'. For consistency, this submission refers to the zoning of the lands as 'C' - 'Community/Educational/Institutional'.)

These changes are illustrated in graphical form in Figures 1.6 and 1.7 below.

The following text and figure should be included as part of Section 4.9 of the Carnew Town Plan in the *Draft Development Plan* to accompany the SLO designation of the lands:

> *"**SLO 4** This SLO is located to the south of the new Primary Care Centre in the east of the town on the Gorey Road. It measures c. 2.3ha in total and shall be delivered as a comprehensive new community development to specifically deliver a scheme comprising nursing home and / or assisted living units, having regard to its strategic location adjacent Carnew Primary Care Centre. Development will be delivered on these lands in accordance with the following criteria:*
>
> - *The design and layout of any development on the lands shall ensure that appropriate amenities are provided for the nursing home clients and residents of the assisted living units, such as the provision of communal open space for each use.*
> - *Access to these lands shall be provided via the new Primary Care Centre entrance off the Gorey Road.*
> - *Appropriate car parking provision, with necessary turning bays and drop-off points will be provided as part of any development proposed. Appropriate pedestrian access to the Primary Care Centre and to the Gorey Road beyond will also be provided as part of any development delivered on the site to ensure connectivity with neighbouring land uses and the services provided in the town."*

1.4.1 Other Associated Alterations Required to Carnew Town Plan

As a result of the alterations required to the lands proposed designations in the *Draft Development Plan*, a number of other changes are also required to the Carnew Town Plan.

Table 4.2 Strategic Land Reserve provided in Section 4.3 of the Carnew Town Plan requires the following omission to reflect the zoning of the northern element of the lands from 'SLB' to 'C' (outlined in red):

Location/Description	Zoning	Potential no. of Units
Lands north of SLO 2	SLB	158
Lands south of the Glendale Estate	SLB	62
Lands adjoining Carnew community care	SLB	20
~~Lands east of the Coves Brook Estate~~	~~SLB~~	~~9~~
Total		~~249~~ 240

In addition, Table 4.3 *Provision of Community and Recreation Infrastructure* under Section 4.6 of the Carnew Town Plan requires the inclusion of the subject lands into the Education / Community Use Group (also outlined in red):

Use Group	Specific use	Zoning	Location	Area (ha)
Education/Community	Primary Education	CE	Lands to the rear of Scoil Aodhan Naofa	0.65
	Secondary Education	CE	Lands to the rear of Colaiste Bhride	3.245
	Community Use	TC	Lands within Action Area 2	1.1
	Community Use	CE	Lands to the rear of the old rectory	4.393
	Community Use	CE	Lands located within SLO4	2.3
Open space	Active Open Space	AOS	Lands north of the existing community park at Parkmore	2.75
	Active Open Space	AOS	Lands at the sport pavilion	1
	Active Open Space	AOS	Lands located within SLO2	1

Furthermore, under Section 8.3 of the *Draft Development Plan*, Objective CD17 should be amended to include the subject lands, with a corresponding map to be provided as Map 8.05:

> *'To provide for new or extended residential care facilities for the elderly at the following locations as shown on maps 8.01-8.04:*
>
> - *Ballinahinch Lower, Newtownmountkennedy (c. 8ha as shown on Map 8.01)*
> - *Blainroe / Kilpoole Lower (c. 2.5ha as shown on Map 8.02)*
> - *Coolgarrow, Woodenbridge (1.5ha as shown on Map 8.03)*
> - *Killickabawn, Kilpedder (c. 6ha as shown on Map 8.04)*
> - *Gorey Road, Carnew (these lands should include assisted living units) (c. 2.3 ha as shown on Map 8.05).'* (Our addition underlined.)

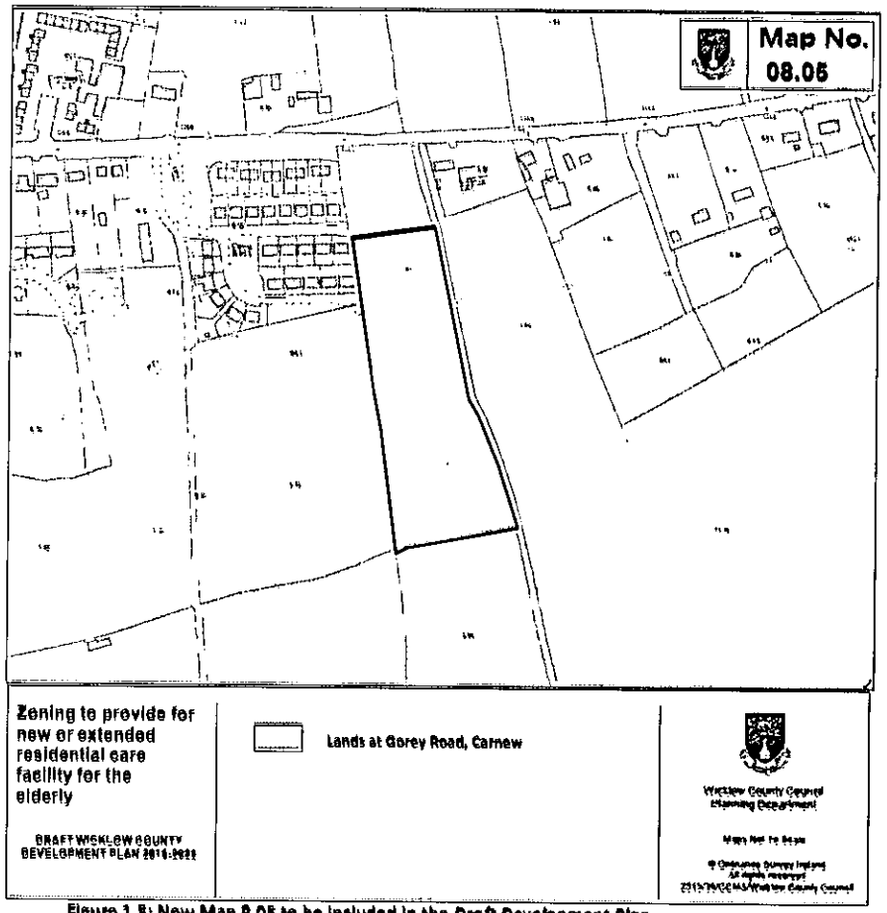


Figure 1.5: New Map 8.05 to be included in the *Draft Development Plan*.
Source: Ordnance Survey of Ireland and the *Draft Development Plan*, with annotation by Tom Phillips + Associates, February 2016 (TPA OS Licence No. AR0008616).

- **"As it is currently proposed"**

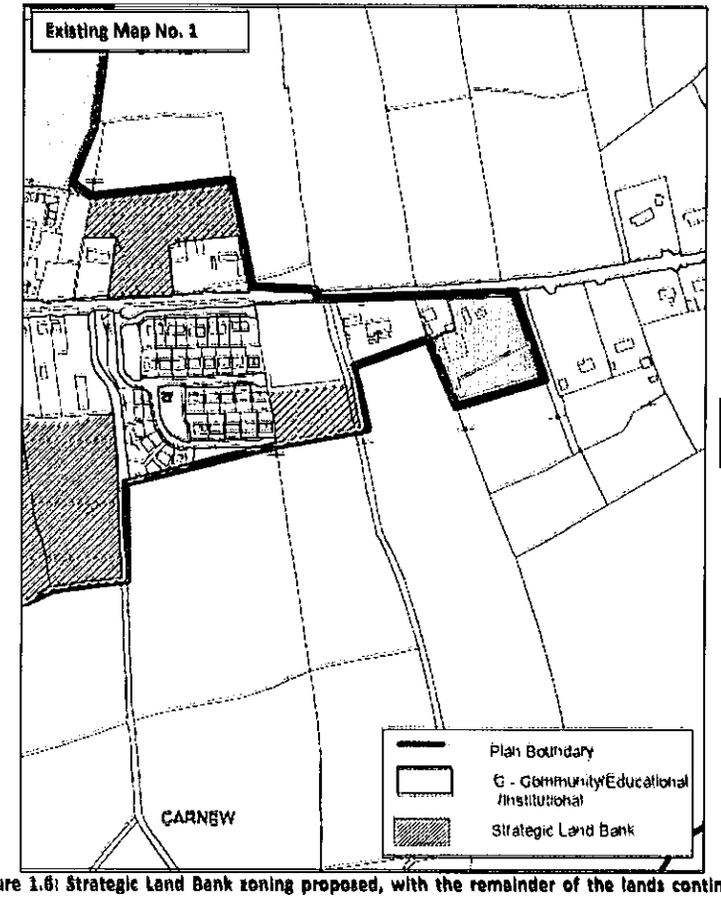


Figure 1.6: Strategic Land Bank zoning proposed, with the remainder of the lands continuing to be 'unzoned' (subject site outlined in red).
Source: Map No. 1 of the *Carnew Town Plan*, forming part of the *Draft Wicklow County Development Plan 2016-2022*; annotated by Tom Phillips + Associates, 2016.

- **"What we seek"**

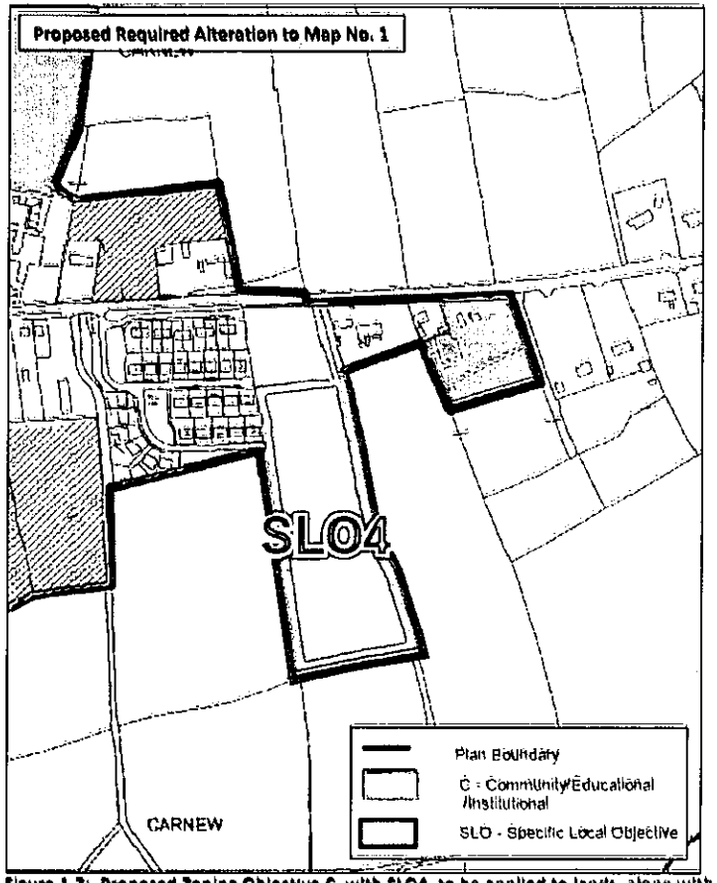


Figure 1.7: Proposed Zoning Objective C, with SLO4, to be applied to lands, along with an extension to the Town boundary.
Source: Map No. 1 of the *Carnew Town Plan*, forming part of the *Draft Wicklow County Development Plan 2016-2022*; annotated by Tom Phillips + Associates, 2016.

2.0 SITE LOCATION AND URBAN DESCRIPTION

2.1 Site Context

The lands subject of this Submission measure 2.3 ha in total and are located off the Gorey Road, immediately south of the new Carnew Primary Care Centre (PCC), which is nearing completion. The lands will be accessed via the new entrance to the PCC via the Gorey Road. (See Figures 2.1 and 2.2.)

The subject site is bound to the north by the new PCC, with the Gorey Road (the R725) beyond; to the east by Coves Brook Housing Development; to the south by agricultural lands; and to the west by a narrow laneway, with residential development and Carnew Tyre Centre beyond.

The landholding is currently greenfield in nature and have most recently been in agricultural use.

2.1.1 Carnew PCC is an Important Addition to Improving the Health Services Provide in Carnew

The Carnew PCC building is a two storey purpose-built facility comprising a total of 1,232 sq m[3]. The entire building is owned by the Client, Combin Properties Limited, and the HSE have leased approximately 960 sq m of the property to provide essential social and health services to the local community.

The Ambulance Service will operate an Ambulance Station from building.

The GP Quarters are interconnecting with the HSE demise and includes a separate reception desk and four medical treatment rooms.

In addition to the HSE demise and ambulance station, there are three self-contained medical units which we be let to providers of private medical services.

The building is built to the requirements and specification of the HSE Estates Department.

The PCC is currently being fitted out by the HSE and it is expected to be open to the public by mid-March.



Figure 2.1: Carnew Primary Care Centre nearing completion.
Source: ATIN Investments Limited, February 2016.



Figure 2.2: Carnew Primary Care Centre nearing completion.
Source: ATIN Investments Limited, February 2016.

[3]An Bord Pleanála granted planning permission for the development in an *Order* dated 11th November 2010 (ABP Reference PL27.237096; WCC Reg. Ref. 09/1304).

3.0 TOWN PLANNING CASE FOR DESIGNATIONS SOUGHT IN AMENDMENTS TO THE *DRAFT DEVELOPMENT PLAN*

The following Sections provide the town planning case for the proposed future amendment to the *Draft Development Plan* to provide for the:

1 Extension to the Carnew indicative town boundary to include the southern element of the site;

2 Rezoning of the northern element of the site from 'Strategic Land Bank' to 'C' 'Community/Educational/Institutional';

3 Zoning the southern element of the site from unzoned 'white' lands to 'C' 'Community/Educational/Institutional'; and

4 Attachment of a Specific Local Objective (SLO) in the form of SLO4 on the entire lands to support the specific development of a nursing home and assisted living units.

3.1 Appropriateness of 'C' Zoning for the Uses Proposed

It is our opinion that the zoning of the lands for 'C' 'Community/Educational/Institutional' is appropriate for the lands. The *Draft Development Plan's* objective for this zoning is:

> '***To provide for*** *civic,* ***community*** *and educational* ***facilities.***' (Our emphasis.) (Page 10; Volume 2 Town Plans and Settlement Plans of the *Draft Development Plan*.)

The *Draft Development Plan* provides the following description:

> '*To* ***facilitate the development of necessary community, health,*** *religious,* ***educational, social and*** *civic* ***infrastructure.***' (Our emphasis.) (Page 10; Volume 2 Town Plans and Settlement Plans of the *Draft Development Plan*.)

The *Draft Development Plan* continues that the Planning Authority shall determine each proposal on its merits, and shall only permit the development of uses that enhance, complement, are ancillary to, or neutral to the zoning objective.

It is our opinion that uses of nursing home and assisted living are fully in accordance with the 'C' zoning objective sought for the lands.

This is further confirmed by the appropriate uses listed for 'C' lands:

> '***Uses generally appropriate*** *for* ***community and educational*** *zoned land include* ***community,*** *educational and institutional uses include burial grounds, places of worship, schools, training facilities, community hall,* ***nursing homes, health related developments,*** *sports and recreational facilities, utility installations and* ***ancillary developments for community,*** *educational and* ***institutional uses*** *in accordance with the CDP.*' (Page 10; Volume 2 Town Plans and Settlement Plans of the *Draft Development Plan*.)

The designation of the subject site specifically for nursing home and assisted living use would ensure that the health and social needs of the local population in Carnew and the surrounding area are suitably met in the short-to-medium term.

It is our opinion that as the northern lands have been rezoned for Strategic Land Bank, rather than R1 as per the current *Development Plan* designations, it is clearly the Local Authority's opinion that sufficient headroom for residential development in Carnew exists for the lifetime of the *Draft Development Plan* i.e. from 2016-2022. Therefore, the required alterations to the lands' designations does not have an adverse impact on the delivery of residential units for the town in the short-term.

3.1 Nursing Home and Assisted Living Use

The shortage of nursing homes beds is a contributory factor to the overcrowding some hospitals have been and are currently experiencing. Therefore, it is essential that such facilities are provided as and when required.

Nursing homes and assisted living provision are essential health and social facilities that must be provided for local communities to facilitate the provision of appropriate care to the elderly and vulnerable adults outside of a typical hospital environment.

A nursing home provides long-term residential care for people who don't need to be in a hospital but require continual nursing care and have difficulty with coping with the required activities of daily living. Residents typically include the elderly but can also provide care facilities for younger adults with physical or mental disabilities.

Nursing homes typically comprise bedrooms (single and / or shared), with communal living spaces, dining areas, treatment rooms, kitchen, staff rooms and general administrative areas.

In addition, nursing homes have nursing staff on hand 24 hours a day for the residents with more acute medical needs. Nursing homes can also provide a range of services on-site, such as medical care, and assistance with personal care, meals, housekeeping and social activities. Other health and social services provision may also be provided, such as physical, speech and occupational therapies.

Assisted living homes are not for people who need constant professional nursing care; rather, they provide some supervised care through a combination of housing, personalised supportive services and health care designed to meet the needs of people who require assistance with daily living. Access to health and medical services is provided as and when necessary. Assisted living can be used by both elderly and adults with mental or physical disabilities. In some instances, residents in assisted living units can move on to nursing homes, if their medical needs change. Therefore, nursing home and assisted living use in in close proximity is beneficial.

3.2 Increases in Life Expectancy and Recent Population Trends Indicate Existing and Future Requirements for Residential Long-Term Care

3.2.1 Significant Population Increases in Persons Aged 65 and Over, Particularly in Wicklow

In examining the potential requirement for additional nursing home and assisted living facilities, it is necessary to examine recent changes in population for persons aged 65 years and over. Table 3.1 below provides this data for Wicklow along with the Leinster region and the State for comparison purposes, over the Census of Population years of 2002, 2006 and 2011.

Table 3.1: Population of Wicklow, Leinster and State by the Number of Persons Aged 65 and Over and Percentage Change Between the Census Years

Area	No. Persons Aged 65 years & over 2002	No. Persons Aged 65 years & over 2006	No. Persons Aged 65 years & over 2011	%age change 2002-2006	%age change 2006-2011	%age change 2002-2011
Wicklow	11,433	12,517	15,001	+9.5	+19.8	+31.2
Leinster	212,470	230,713	268,688	+8.6	+16.5	+26.5
State	436,001	467,926	535,393	+7.3	+14.4	+22.8

Source: Census of Population, 2002, 2006 and 2011; CSO, 2016, extrapolated by Tom Phillips + Associates, 2016.

It is clear that Wicklow has experienced a significant increase in the number of people resident in the County aged 65 and over - a 9.5% increase between 2002-2006, a 19.8% increase between 2006-2011 and a substantial 31.2% increase between those years of 2002-2011. This is significantly in excess of population increases experienced over the same periods when compared to the same population increases for the same age cohort in the Region and the State.

3.2.2 Projected Population Increases in Those Aged 65 and Over will Likely be Significant

Significantly, people aged 65 years and over account for some 12% of the total population[4]. The CSO estimates that the number of persons in this age cohort is expected to increase very significantly from this 2011 level to between 850,000 No. persons and 860,700 No. persons by 2026, and to close to 1.4 million persons by 2046[5].

3.2.3 Mortality Rates Continuing to Improve

It is globally recognised that mortality rates have significantly improved since the start of the 20th century. In Ireland, male life expectancy has increased from 57.4 years in 1926 to 77.9 years in 2010, a gain of 20.5 years over a period of 84 years, while females have experienced a gain of 24.8 years, from 57.9 in 1926 to 82.7 years in 2010[6]. The CSO estimates that improvements in life expectancy are predicted to continue, resulting in male life expectancy increasing to 85.1 in 2046 and female life expectancy to 88.5 by the same year[7].

This level of growth in the elderly population has never before been seen in Ireland and brings with it significant implications for policy, service delivery and long-term planning in a range of areas, most significant of which is housing and the increase in the number of people requiring residential care.

Research funded by the Centre for Ageing Research and Development in Ireland (CARDI) in 2012 found that the number of people aged 65 and over using residential care will rise to 12,270 by 2021 – an increase of 59% since 2006[8]. Therefore, CARDI estimates that for every year from 2015 until 2021, an extra 818 No. additional people will require residential long-term care. However, CARDI estimate that only 300 places were being created in 2015[9]. This is a significant shortfall when compared to need.

[4] Based on the 2011 Census of Population of the State of 4,588,252 No. persons.
[5] *Population and Labour Force Projections, 2016-2046*; Central Statistics Office, April 2013.
[6] Ibid.
[7] Ibid.
[8] https://www.pai.ie/2015/06/1781-ireland-s-ageing-population/
[9] Ibid.

3.2.4 Clear Current and Future Need Predicted for Appropriate Care Facilities, Particularly for the Aged

It is therefore very clear that the increases in the population of persons aged 65 and over, coupled with ongoing improving mortality rates, means that the current and predicted future need for nursing homes and assisted living units are on the significant increase.

It is essential that appropriate planning and policy making to address the challenges faced by Ireland's ageing population is therefore carried out. The alterations required in this Submission would go some way towards addressing the potential future social infrastructure (housing and care) requirements of the population of Carnew and the County generally in the future.

3.3 Suitability of the Lands for Nursing Home and Assisted Living – Synergy with PCC

It is our opinion that the zoning of the lands to 'C' and development of these lands specifically for nursing home and assisted living use, directly south of existing 'C' zoned lands, which accommodate the PCC, is inherently appropriate in land use planning terms.

We have sequentially assessed each area of land zoned 'C' in the Carnew Town Plan as provided in the *Draft Development Plan* and it is our opinion that these can be discounted due to unsuitability and / or existing Local Authority policies and objectives to develop other community-based uses on the land. Please refer to Figure 3.1 below for these lands' locations in Carnew.

1. **Graveyard** – not suitable for alternative development due to the existing use as a graveyard.
2. **Lands southeast of the graveyard** – these lands are currently in agricultural use and appear to be available for development. However, it is our opinion that they are not as suitable for development of a nursing home and assisted living units' scheme as the lands subject of this Submission, given the location of the PCC directly north of our Clients' lands.
3. **SLO3 lands** – the Carnew Town Plan states that the 'C' zoned lands shall be developed for a car park with necessary turning bays, drop-off points and pedestrian access to the existing primary school. These lands are therefore not suitable for the development supported by this Submission
4. **Scoil Aodán Naofa National School** - these lands are in use as a primary school. It is reasonable to assume that the directly adjoining lands are reserved for further educational use and are therefore not suitable for the development supported by this Submission.
5. **Lands with sports pitches** – these lands comprise sports pitches. Therefore, it is likely that these lands are reserved for the further development of sports and recreational uses for the town.
6. **Church Of The Most Holy Rosary RC** – the lands are in church use and are therefore not suitable for the development supported by this Submission.
7. **Coláiste Bhride Carnew and adjoining lands** – these lands are in use as a secondary school. It is reasonable to assume that the directly adjoining lands are reserved for further educational use and are therefore not suitable for the development supported by this Submission.
8. **All Saints' Church of Ireland** – the lands are in church use and are therefore not suitable for the development supported by this Submission.
9. **AA2 designated lands** – the Carnew Town Plan states that a minimum of 1.1ha is to be reserved to facilitate community and / or possible educational development. It continues that any design proposals for AA2 shall include details for the provision of community facilities, the nature of which is to be determined following consultation with local community groups and the

Community, Cultural and Social Development Section of the Local Authority. It is therefore our opinion that it is likely that these lands would see the delivery of a use that would be available for the local community, such as community centre etc. As such, these lands would not be considered suitable for the land uses outlined in this Submission.

10 **Carnew Community Village and Day Care Centre** – these lands have been fully developed and it appears that there is little room for significant further expansion on the site, with the exception of perhaps localised extensions to the existing buildings.

11 **Lands subject of this Submission** - the provision of a nursing home / assisted living units directly adjacent the PCC would result in a synergistic relationship between the services provided in the PCC and any potential development of nursing home and assisted living units on the neighbouring lands. Appropriate medical and health support services would be readily accessible to the nursing home and residents of the assisted living units. In addition, the presence of the Ambulance Station from the PCC would mean that anyone requiring acute medical treatment in a hospital would be attended to within a relatively short space of time.

It is clear that the subject lands are the most suitable and the most readily available for the development of nursing home and assisted living use, compared to other 'C' zoned lands in the town. Therefore, the zoning of the subject lands specifically for these uses is fully in accordance with the proper planning and sustainable development of the area.

3.3.1 Support from the HSE

Our Client, having constructed the PCC, has discussed the possibility of delivering a nursing home and assisted living development on these lands with Mr Jim Curran, Head of Estates HSE. Mr Curran has stated that there is no objection in principle to the proposal and confirmed that a letter of support can be provided to the Client for presentation to the Local Authority, if required.

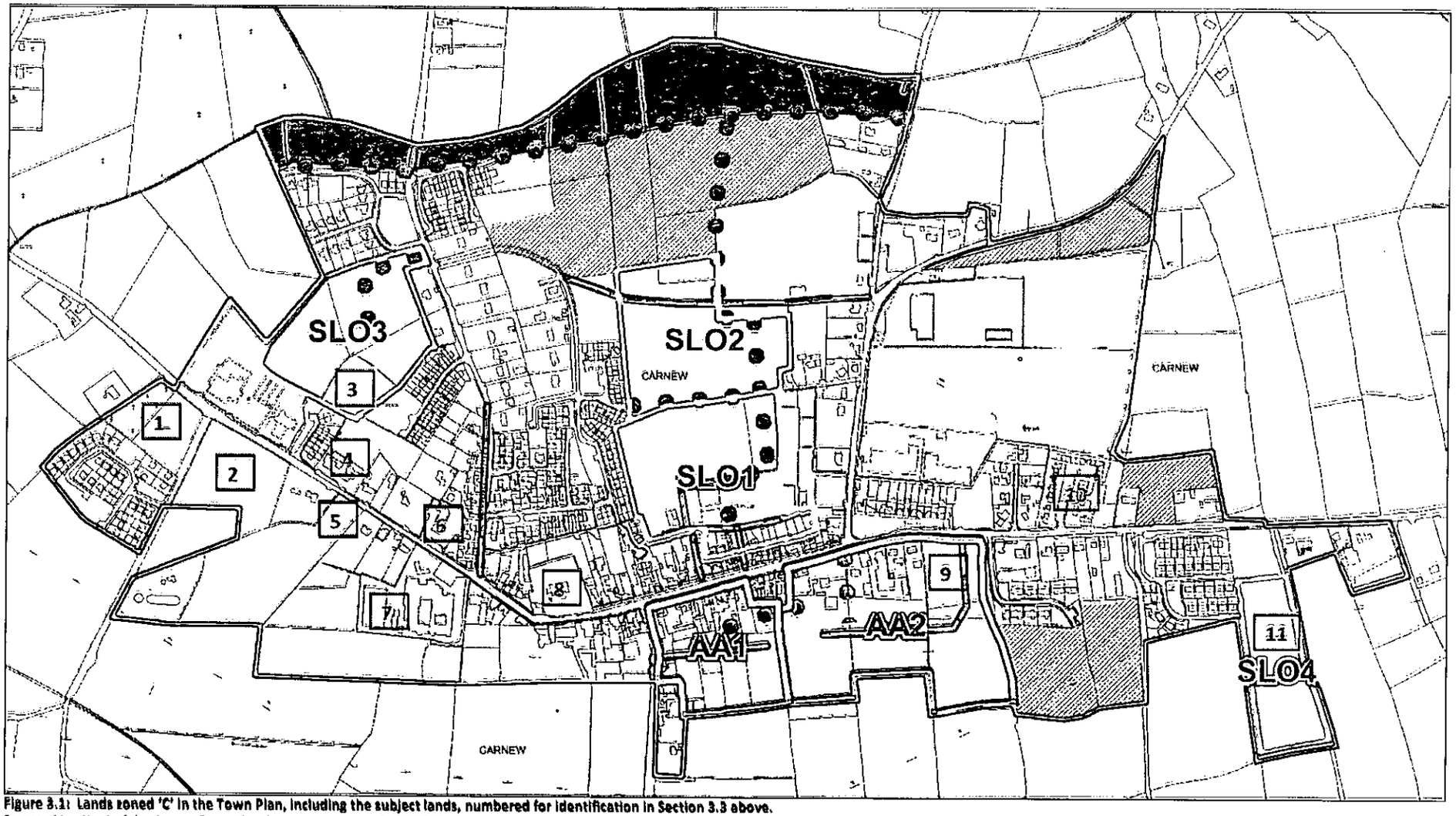


Figure 3.1: Lands zoned 'C' in the Town Plan, including the subject lands, numbered for identification in Section 3.3 above.
Source: Map No. 1 of the *Carnew Town Plan*, forming part of the *Draft Wicklow County Development Plan 2016-2022*; annotated by Tom Phillips + Associates, 2016.

3.4 Importance of Nursing Home and Assisted Living Provision in Current Statutory Planning Policy

The current *Development Plan* acknowledges that the purpose of social infrastructure is to provide a service and also to promote community cohesion and community identity and in doing so combat social isolation and alienation. The *Development Plan* confirms that facilities providing physical and mental care, such as nursing homes and facilities for those with special needs, falls within this category.

Section 15.3.2.2 of the *Development Plan* acknowledges that the provision of residential care and nursing homes is an essential community requirement and one which is underdeveloped in Wicklow.

The *Development Plan* provides the following health and nursing home-related policies to support the ongoing development of such facilities:

> *'**HC2** To **support the establishment** of **new** or expansion of existing hospitals, **nursing homes**, centres of medical excellence, hospices, **respite care facilities** or **facilities for those with long term illness**.'*

> *'**NH1** To **encourage the development** and improvement **of new** and existing **residential** and day **care facilities throughout the County**.'* (Our emphasis.)

The *Development Plan* states that there is a need to expand community facilities to cater for the growing population of Carnew town, and specifically provides an objective:

> *'To **encourage** and **facilitate the provision of** housing **/ facilities for the elderly**.'* (*Development Plan* Volume 3 Chapter 4 *Carnew Town Plan*.)

One of the Local Authority's visions for Carnew is *'to provide a framework for the growth of the town, in order to provide housing for current and future generations, to revitalise the economy of the town and to allow improvements of social and community facilities'*.

As such, it is clear that the Local Authority fully supports the ongoing provision of nursing home and related facilities in Carnew and also in the County, generally.

3.4.1 Proposed Required Alterations to the Statutory Designations Complies with *Draft Development Plan* Policy

It is our opinion that the zoning of the lands to 'C', with an accompanying SLO, is fully in accordance with the *Draft Development Plan's* approach to the delivery of an appropriate quantum of social infrastructure to facilitate the ongoing needs of the town and County's population.

The *Draft Development Plan*, the same as the current *Development Plan*, recognises the:

> *'...**growing need for the provision of specific residential and day care facilities for the elderly. The Council recognises that the provision of residential / day care and nursing homes is an essential community requirement and that this area is underdeveloped in this County**'*. (Section 8.3.2 *Draft Development Plan*.) (Our emphasis.)

The Local Authority continues that it will facilitate residential care and nursing home providers in the delivery of these services and includes the following relevant Health and Care Objectives in the *Draft Development Plan* (Section 8.3.2), similar to current *Development Plan* policy:

> *'**CD15** To **facilitate** the **establishment of new** or expansion of existing hospitals, **nursing homes**, centres of medical excellence, hospices, respite care facilities or **facilities for those with long term illness**.'* (Our emphasis.)

> *'**CD18** To **facilitate** the **development** and improvement of **new** and existing **residential** and day **care facilities throughout the County**.'* (Our emphasis.)

> *'**CD19 Residential** and day **care facilities shall in general be required to locate in existing** towns or **villages** and **shall be located close to shops and other community facilities required by the occupants** and shall be **easily accessible to visitors, staff** and **servicing traffic**; locations outside of delineated settlement boundaries shall only be considered where:*
>
> - *the site is located in close proximity to a settlement and would not comprise an isolated development;*
> - *there are excellent existing or potential to provide new vehicular and pedestrian linkages to settlement services; and*
> - *the design and scale of the facility is reflective of the semi rural location.'* (Our emphasis.)

With respect to CD19 above, the lands are ideally suited for nursing home and assisted living uses. Some of the lands are located within the indicative town boundary – this Submission requests the extension of the town boundary to facilitate the future development of such a facility.

Whilst the southern element of the lands may be considered to be on the edge of the town by reason of the current indicative town boundary, they are not 'isolated' – they are advantageously located directly adjacent Carnew PCC and are within walking distance of Carnew town centre. The lands' location on the Gorey Road allows for easy accessibility by visitors, staff and servicing traffic and a new footpath connecting the PCC to the town centre is currently under construction, thus providing safe and easy pedestrian access to the wider urban area. The design of any future scheme proposed on the lands can be cognisant of the existing settlement pattern of the immediate area and this can be dealt with through the development management process.

The alterations sought to the lands' statutory designations are therefore fully in accordance with the Local Authority's vision to ensure the future sustainable development of social infrastructure and address the deficits in nursing home provision, as outlined in the *Draft Development Plan's* policies and objectives for the County, generally, and Carnew specifically.

Furthermore, zoning also presents the opportunity to increase the economic vitality of the town and area by, for example, by increasing the quantum of employment generating opportunities for the town.

The proposed zoning would therefore fully comply with the relevant policies of the *Draft Development Plan* to encourage additional local employment provision in Carnew.

3.5 Conclusion – Appropriate Zoning Proposed

In summary, the proposed required alterations to the lands' designations in the *Draft Development Plan* presents an opportunity to support the provision of nursing home and assisted living use on a site which is strategically linked to the new PCC located in Carnew Town. Such provision will help to increase and enhance the range of social and community services available for the town and would thus contribute to the sustainable social development of the area.

It has been demonstrated that the zoning designations sought in this submission is fully in accordance with *Draft Development Plan* policy and as such is in accordance with the proper planning and sustainable development of the area.

4.0 CONCLUSION

In conclusion, we trust that this Submission illustrates the importance of the subject lands for nursing home and assisted living use, in accordance with current and proposed *Development Plan* policy.

We trust that this submission will be taken into consideration in preparation of any alterations to the *Draft Development Plan*.

If you have any queries or comments with regard to this submission we would be happy to discuss this matter further or furnish the Council with any information that may be required.

Yours faithfully

Sine Kelly
Associate
Tom Phillips + Associates

C44

Leonora Earls

From: kristin o'donovan [
Sent: 19 February 2016 16:58
To: Planning - Development Plan Review
Subject: Proposal for draft County Development Plan

Common Ground is a members based group located in Bray that was formed three years ago and now has 200 plus members. We came together to create a community that will have a positive impact on the people of north Wicklow, through the sharing of ideas, skills, crafts and food

We propose that the Vision Statement be extended to include the statement that Wicklow be declared a TTIP (Transatlantic Trade & Investment Partnership) Free Zone, as has recently happened in County Clare when Clare County Council passed a motion to declare the County a TTIP Free Zone.

Common Ground, O'Rahilly Hall, Church Terrace, Bray, County Wicklow

Kristin O'Donovan pp. Common Ground

Planning Dept.
Wicklow Co Co

Wicklow Co... 18 FEB 2016

17/2/2016



Re: Wicklow Co Development Plan 2016-22.
Environs of Enniskerry Village

WICKLOW COUNTY COUNCIL
18 FEB 2016
Corporate Affairs

"FERNDALE"
Enniskerry, Co. Wicklow.
Email: ...
Website: ferndalehouse.com

I wish to make the following observations and recommendations for consideration:-

- The over-riding objective should be to ensure that any development/population growth in Enniskerry is balanced with heritage/traffic and general sustainability considerations.
- The proposed 470 additional residential units would seem to imply a much bigger population growth than is stated in the draft and seems excessive.
- The planners should preserve the 'Bowe effect' around the Village from heritage and areas of 'outstanding natural beauty' considerations.
- The proposed re-zoning behind the Veg. Shop/Phone Centre building would impact negatively on the heritage aspects of the Village and would create additional traffic hazards beside an already dangerous cross roads. There would also seem to require demolition of an end of terrace house in an area of Specific Architectural Conservation & alternatively add to already excessive car parking in the Village centre.

2

- Improve communication between Councillors and officials in W.C.C. and DL Rathdown re traffic and other material considerations in the context of the huge development/population expansion in Fassaroe, Cherrywood and Kilternan. These developments obviously have huge traffic and other implications for north Wicklow in general and Enniskerry in particular.



"FERNDALE"
Enniskerry, Co. Wicklow.
Phone: (
Fax: (
Email: info@
Website: ferndalehouse.com

- Any development on the sloping fields/areas near Enniskerry village could have negative implications for water tables/flood waters, ref Eagle Valley/New C.of I. school & previous village flooding.
- Congrats to Planners on sterilising area behind Catholic Church for future development. In the past developments approved by W.C.C. on this site & the site behind the Veg Shop/Phone Centre [overturned on appeal to An Bord Pleanala] did not give sufficient consideration to heritage, traffic and other issues.

Wishing you well and hoping the plan works for the general population.

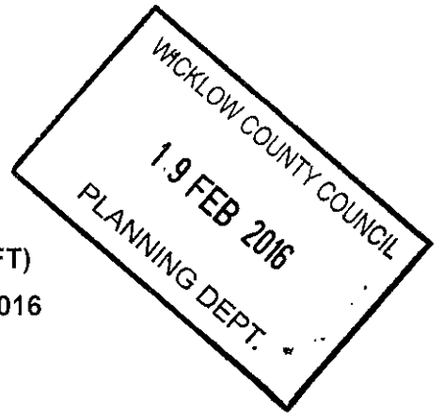
Yours

Noel Corcoran

C46

Dervla Cotter B Arch MRIAI Rosdarach Cookstown Enniskerry Co. Wicklow

Director of Services Planning and Economic Development
Wicklow County Council
County Buildings
Wicklow



WICKLOW COUNTY DEVELOPMENT PLAN 2016 – 2022 (DRAFT)
SUBMISSION ON ENNISKERRY TOWN PLAN - 18th February 2016

Town Plans and Settlement Plans

It is noted that "*Town Plans shall only include objectives that:*

- *are settlement specific and achievable*
- *avoid those that are aspirational or are best dealt with in the annual budget, road works programme, etc.*
- *put in place framework within which development can occur*
- *does not decide what works actually get done by either private individuals or public bodies.*
- *delivery of objectives will be determined by the initiation of private development or by the allocation of public funding through the annual budgetary process, which is a separate process to any land use plan."*

The statements above are listed given elements of contradiction contained therein along with an apparent indication that development of zoned lands can / may be permitted prematurely or without addressing significant issues raised during planning processes re infrastructural or other deficits. The failure to adequately allow for / identify necessary works / allocate budgetary responsibility etc. required to facilitate development of zoned lands is a recurrent theme in the town plan / area action plans for Enniskerry. This is contrary to the generally accepted principles governing proper planning and development in relation to advance planned infrastructural provision particularly where it is proposed to urbanise what are essentially farmlands located around a small central core while significantly increasing the housing stock (by over 50%) thereby totally transforming a scenic rural area and associated rural infrastructure.

It is noted Enniskerry is classified as a Level 5 town and the town plan and any proposed development would be governed by the core strategies of the CDP as they apply to level 5 and other objectives stated in the introduction of Town Plans and Settlement Plans.

A study of the town plan indicates a number of apparent inconsistencies / contradictions / key omissions in relation to stated the policies / objectives / visions contained in the CDP / Enniskerry Town Plan, some of which I refer to in this submission.

Zoning / Density / Phasing

It is noted the Enniskerry Town Plan land use zoning does not identify infill residential sites within the 0.5 km radius of the centre (apart for AA2 Figure 6.3 AA2), which could mitigate the residential zoning deficit, but focuses primarily on the development of Greenfield sites located on the outskirts of the town centre. In some cases the zoned AA plan lands are adjacent to or surrounded by existing residential development with densities of 10 / ha or greater.

Action Area 3 Plan (9.4 ha) in the Enniskerry Town Plan 2016 – 2022 was formerly AA4 in the Enniskerry Local Area Plan - 2010 – 2016 Wicklow County Development Plan.

- The current density outlined for the AA4 lands is: a maximum of 2.15 ha to be developed for housing at a maximum density of 20 / ha. – yielding approx **40 units**

- The proposed 2016 – 2022 density for the AA3 lands is: a maximum of 6.7 ha (over three times the previous area) to be developed for housing with a maximum 3 ha at a maximum density of 10 / ha and the remaining 3.7 ha at a maximum density of 20 / ha - yielding approx **100 units**

The proposed overall density for the 6.7 ha designated for residential is the equivalent of 15 units / ha and represents an increase of 2.5 times the number of units when compared to existing zoning. Cookstown Road (LP-1020) is a winding country road with residential densities of less than 2.5 / ha - 1 dwelling per acre as per previous Wicklow County Development Plans - excepting the nearby Enniskerry Demesne and Eagle Valley each with densities significantly lower than 10 / ha.

The AA3 residential area is proposed at an average density of 15 / ha. An appropriate zoning to be considered in this instance would a low density zoning or - R10 zoning (10 / ha - rural fringe) given the existing densities on neighbouring lands, the infrastructural deficits relating to foul waste water disposal, the capacity of the LP-1020 to deal with the traffic arising from the densities proposed and the sensitive location in terms of scenic beauty and Architectural Heritage etc.

Consideration should be given to the lower rural fringe density to preserve the character and appearance of this country road and to minimise negative impacts on landscape, scenic beauty, natural amenity etc. It is noted that the lower density of existing developments, clusters and one off houses located along this road have not visually detracted from the rural character of the road.

The proposal for these lands contravenes the stated principles governing **phasing.** The zoning specifying 15 / ha higher density on the AA3 lands is *'leapfrogging'* to *'peripheral areas'*, does not *'encourage infill opportunities'* and appears to ignore the requirement for *'development of areas contiguous to existing developed areas'* given the existing lower residential densities (significantly lower than 10 / ha) of all of the lands surrounding AA3. The same is observed to a lesser extent in relation to proposed densities for other area action plans in the Enniskerry town plan located on the outskirts of previously developed land.

The stated principles may only be *'contravened'* in *'exceptional circumstances'* and exceptions must *be 'clearly justified by local circumstances'* and such *'justification set out in any planning application proposal'.*

It is my opinion that the proposal for AA3 contravenes the stated principles and that there is **no justification** for this exception / contravention either in the Enniskerry town plan or in any planning application/s relating to the AA3 lands.

Transportation and Movement / Service Infrastructure Objectives / Traffic

It is noted that the access to the AA3 lands is proposed via the local road LP-1020 (Cookstown Road) – no proposals are made as to the treatment of this road re upgrading / public paths / or dealing with driver and pedestrian safety due to significantly increased traffic resulting from the development of these lands.

The proposed zoning and densities for the action area plan would indicate a potential for 200 cars (approx two cars per household) stored on site with resultant traffic movements of this order at rush hour times and additional associated traffic movements throughout the day. All traffic associated with the AA3 lands will travel to the M11 / N11 and Bray via the length of the Cookstown road to join the R 117 as this is the shortest route to the R117 etc.

The Eagle Valley and the Powerscourt Estate developments have greatly increased the vehicular traffic on the Cookstown Road - the direct route to the R 117, M50 / N11 etc. The increase in vehicular traffic has resulted in a significant decrease in pedestrian and other traffic; users of this narrow and winding road are no longer safe walking or cycling given the volume and speed of traffic (travelling at or above the speed limit which is 80 km for the major portion of Cookstown road). In order to avail of public transport or shopping facilities, travel to school etc. the majority of residents now resort to travelling by car to Enniskerry. Safe vehicular egress from existing housing along the road is increasingly problematic.

The omission of any reference re upgrading the LP-1020 is of great concern and is in stark contrast to proposals relating to other AA plans which envisage - 'new distributor road' Fassaroe to Monastery, 'improvements to the R117' and Ballyman Road, or 'continuous footpath from Kilmolin to Enniskerry town centre' – a road which is fairly straight with good sight lines etc.

A comprehensive road traffic study should be commissioned to ascertain the current road traffic and pedestrian safety issues on this road and to assess impact of extra vehicular traffic generated by the proposed development including daily movements when the development is completed but also the impacts of construction traffic movements over the prolonged (proposed) phasing of the development. The scope of the study should include future proofing of any level of development up to or exceeding a density of 10 / ha on the AA3 lands with evidence based conclusions / recommendations based on current best practice, DMURS etc. to be followed by advance implementation of mitigation measures along the length of the road.

The AA3 proposal will greatly increase vehicular traffic on this hazardous road. In the absence of the resolution of the current issues relating to traffic and pedestrian safety along the whole length of the LP-1020 I consider the stated zoning strategy / objectives for these lands to be inappropriate, premature and inconsistent generally when compared with the proposals in relation to transportation / movement etc. for the other area action plans.

Built and Natural Heritage / Heritage Objectives / Preservation / Protection of Views - Sugarloaf Mountain

The Natural Heritage Area as denoted in the Heritage objectives Map no. 2 is noted. The inexplicable interruption to the Natural Heritage Area is also noted. The historic estates of Powerscourt and Dargle Lodge lands along the Dargle River are designated natural heritage areas while the Henry Grattan, Tinnehinch estate / other lands along the Dargle valley linking these two areas are omitted from such designation.

The basis for the omission of these lands from Natural Heritage Area designation is unclear particularly given the proposal for an 'amenity zone' at the edge of the AA3 lands onto the Dargle Valley and 'pedestrian route along the Dargle' etc.

Indeed the AA3 lands themselves could be considered for such a designation as the fields are part of the landscape adjacent to the linked protected structures of the Powerscourt Gates and St. Patricks Church, are located at the gateway to the Wicklow mountains, the route to Powerscourt Waterfall and at the edge of the unspoilt Dargle Valley – in all one of the most scenic parts of Enniskerry with rural views / Sugarloaf etc. daily experienced by the many visitors to the Powerscourt Estate, Dargle Valley and Wicklow Mountains.

It would appear that the Dargle valley south of the AA3 lands area is not designated as a natural heritage area / heritage objective as the zonings etc. proposed for Action Area 3 would be inappropriate on lands adjacent to a designated Natural Heritage Area.

This startling inconsistency should be addressed by designating the whole Dargle Valley / woodlands and field systems etc. as a Natural Heritage Area.

The proposal for these lands is inconsistent with the stated objectives in relation to Built and Natural Heritage and also Passive Open space '*To protect, enhance and manage existing open, undeveloped lands that comprise flood plains, buffer zones along rivers and EU protected sites, green and ecological corridors and areas of natural biodiversity.*'

It is further noted that only VIEW shown on the Heritage Objective Map no. 2 is the view South from the Ballyman Road over the SLO1 site (above) while the view of the Sugarloaf South from the Cookstown Road over the AA3 site is omitted and is not listed in the Schedule 10.14 (Views of Special Amenity Value) despite being central to the conditions for the development of the AA4 lands in the current Wicklow County Development Plan (2010 – 2016) and the now AA3 lands draft plan (2016 – 2022)

Infrastructure Strategy

The overall requirement in the stated strategy is not met as regards wastewater treatment given the insufficient capacity of the Enniskerry wastewater treatment plant (as stated in the Enniskerry town plan).

With regard to the AA3 lands thee Eastern portion, zoned at a density of 20 / ha, has no gravity access to a main foul waste sewer, while the western portion, zoned at a density of 10 / ha, has gravity access to a main foul waste sewer.

No provision is made re storm water / surface water runoff / attenuation - the portion of road to the north east of the site is prone to regular flooding on an annual basis i.e. not limited to 50 or 100 year events. It is not clear that there is no anticipated additional impact re flooding etc. Given the particular road flooding issues experienced in the immediate area (with the associated road traffic hazards) it is reasonable to expect that advance works to deal with current flooding or any additional flood risk would form an integral part of AA3 proposals i.e. Flood risk assessment and advance implementation of mitigation measures etc.

Clarification is required as to whether the additional load on existing infrastructure renders AA3 infeasible until such time as adequate advance provision has been made by WCC in relation to increased infrastructural capacity to service zoned lands.

Social and Community Development

The proposals re social and community development are generally to be welcomed as there is a significant under provision of WCC facilities in Enniskerry. I consider that the proposed equipped playground at AA1 is in the wrong location i.e. not in the town centre. This facility should be located in the Bog Meadow close to the core and associated parking, schools and complementary shopping, sporting and other opportunities / activities.

A facility similar to the high quality linear riverside playground as developed at Ashford should be the exemplar for this element of the plan. A playground sited in this location would become an attraction in itself and would further promote commercial activity in the core.

Given the limited facilities supported / provided by WCC in Enniskerry and in light of the benefit accruing to WCC from the high property taxes general to the area it is not unreasonable to request that WCC would take account of the preference of residents re the optimal location of facility of this type in the core and not in an area which is, and will always be, regarded as a peripheral location.

Conclusions

The proposal for the AA3 lands will significantly damage the visual amenity of a highly sensitive and visible tourist location and is, in my view, inconsistent with the stated parameters of *'environmental protection'* and *'sustainability'* and in fact in many respects contradicts the *'vision'* for Enniskerry particularly as regards developing tourism potential including the stated objectives re tourism related development and employment etc.

I suggest that the proposals regarding the AA3 (2016 – 22) be re-examined in the context of a full exploration of the overall Enniskerry Town Plan Objectives. Heritage area designation could be considered or as a minimum the zoning altered to SPECIAL LOCAL OBJECTIVE with a cap on the maximum units for the 6.7 ha at 4 / ha i.e. similar to that proposed for SLO1 in the Monastery Town land (fig 6.5 SLO1) or alternatively the R10 new residential development rural fringe zoning could be considered on the entire lands.

While it is accepted that residential development on the outskirts of Enniskerry is considered necessary into the future; the Enniskerry Town Plan is inconsistent and flawed in many aspects generally and particularly as regards to the series (non-exhaustive) of issues raised in this submission in relation to the AA3 lands.

It is acknowledged that it is difficult to prescribe for proper planning and development via a written document. Enniskerry is a historic village with particularly scenic environs. The Enniskerry economy is based on local business / services and is heavily reliant on tourism due the attractive and well preserved historic centre, the Powerscourt Estate and the outstanding natural beauty of the Dargle Valley and the Wicklow mountains.

The Enniskerry area is a true gateway to the Wicklow Mountains / the open countryside and is a valuable amenity accessible to nearby urban populations. The area enjoys a high level of foreign and locally generated tourism due to its proximity to these urban centres.

In this context any development on AA lands should be an exemplar of high quality design and sustainable rural planning and should not detract from the high quality rural look and feel of Enniskerry and environs.

I request in the interests of sustainable and proper planning and development that the various issues raised in this and other submissions are addressed by Wicklow County Council when finalising The Enniskerry Town Plan / County Development Plan.

Yours sincerely,

Dervla Cotter B. Arch MRIAI

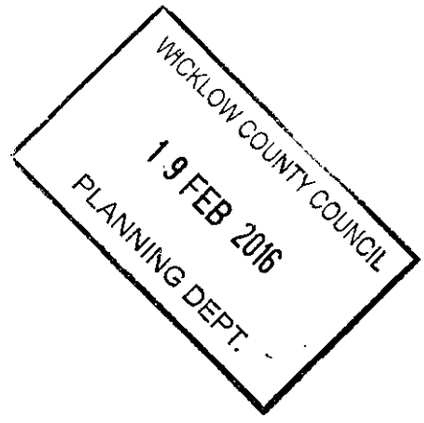
REGISTERED ARCHITECT 2016 RIAI

ARCHITECT, ACCREDITED IN CONSERVATION RIAI

C47

Anthony Cotter FRIAI Derravara Cookstown Enniskerry Co. Wicklow Tel

Director of Services Planning and Economic Development
Wicklow County Council
County Buildings
Wicklow



DRAFT - WICKLOW COUNTY DEVELOPMENT PLAN 2016 – 2022

SUBMISSION ON ENNISKERRY TOWN PLAN - 19th February 2016

The Action Area 3 Plan in the Enniskerry Town Plan 2016 – 2022 is the same area (9.4 ha) and location as AA4 in the Enniskerry Local Area Plan of the present 2010 – 2016 Wicklow County Development Plan which stipulates , among other the criteria:

- A maximum of 2.15 ha to be developed for housing at a maximum density of 20 / ha. – yielding a **TOTAL 43 units**

The 2016 – 2022 AA3 criteria stipulate:

- A maximum of 6.7 ha (over three times the previous area) to be developed for housing with a maximum 3 ha at a maximum density of 10 / ha and the remaining 3.7 ha at a maximum density of 20 / ha - yielding a **TOTAL 104 units** (representing an increase of 2.5 times the number of units)

The proposed overall density for the 6.7 ha designated is the equivalent of 15 units / ha

Cookstown Road (LP1020) is a quiet rural road with residential densities of less than 2.5 / ha (as required by previous Wicklow County Development plans for a minimum of 1 acre per dwelling) excepting the western end junction with the R760 at Powerscourt Gates where the ENNISKERY DESMESNE was permitted @ circa 4 / ha.

Enniskerry Demesne and EAGLE VALLEY (density circa 6 / ha) are both within 0.5 km (500m) radius of Enniskerry Village (now town centre).

It is illogical and inappropriate that the AA3 residential area is now proposed at an average density of 15 / ha.

It is equally illogical and inappropriate that the Eastern portion (Berridge lands) which has no gravity access to a main foul waste sewer is zoned at a density of 20 / ha, while the western portion (Powerscourt Estate) which has gravity access to a main foul waste sewer is zoned at a density of 10 / ha.

It is to be regretted that the Enniskerry Town Plan land use zoning does not identify further INFILL residential sites within the 0.5 km radius of the centre (apart for AA2 Figure 6.3 AA2) which could contribute to the alleged residential zoning DEFICIT at densities of 20 / ha or greater, for instance:

- Land to the East accessed via the laneway opposite the AOH Hall on Church Hill.
- Land to the South at the 'Forge' junction.
- Land to the North at Parknasilloge and Monastery.
- Land to the West in Knocksink accessed via Kilgarron Hill.
- Land within the town centre to the rear of the street frontage North West of the Clock Tower.

In conclusion I would suggest that the AA3 (2016 – 22) zoning be rescinded or deferred until the overall Enniskerry Town Plan Objectives are fully explored or alter the zoning to SPECIAL LOCAL OBJECTIVE with a cap on the maximum units for the 6.7 ha at 4 / ha i.e. a maximum of **27 units** similar to that proposed for SLO1 in the Monastery Townland (fig 6.5 SLO1).

Finally I have observed that the only VIEW noted on the Heritage Objective Map no. 2 is the view South from the Ballyman Road over the SLO1 site (above) while the view of the Sugarloaf South from the Cookstown Road over the AA3 site is NOT shown, nor listed in the Schedule 10.14 (Views of Special Amenity Value) despite being central to the conditions for the development of the Cookstown lands in the current Wicklow County Development Plan (2010 – 2016) and the draft plan (2016 – 2022)

Yours faithfully,

Anthony Cotter FRIAI

C48

Sorcha Walsh

From: Rose Mary Craig
Sent: 07 January 2016 20:11
To: Sorcha Walsh
Subject: Re: WCC Development Plan 2016 onwards

Thanks Sorcha for your very comprehensive reply. Much appreciated!
I do,think it very late to give such notice.....but anyway all is well and I was there and indeed saw and heard you speak to some residents of Enniskerry. I spoke for quite a while to very helpful Stephen.
One thing I heard you say was that Enniskerry had the least number of planned houses. Well I would have thought that there is good reason for that considering that Enniskerry is visited by over a quarter of a million visitors to one of Ireland's greatest tourist attractions - Powerscourt and I assume that this is one goose whose golden egg benefits many in Wicklow!
Enniskerry, the tiny village nestling at the foot of the Cookstown River is situated in a natural hollow which creates serious connectivity problems as you well know I am sure. We have many social housing developments surrounding the village so I don't think that Enniskerry can be accused of elitism.

To call it a town is ridiculous...just to satisfy planners and housing numbers it being so near to Co Dublin.
I live on Church Hill and there is almost a continuous traffic jam outside my house at weekends as cars and buses and coaches struggle up and down and nobody is prepared to put in any parking controls like a double yellow line on the left as one goes up towards Powerscourt. Also the third Enniskerry platform designated for Church Hill was never put in in spite of our requests etc. The Garda used to put out bollards but seem to have given that up!

With kind regards
Rose Mary

> On 7 Jan 2016, at 14:33, Sorcha Walsh <SWalsh@wicklowcoco.ie> wrote:
>
> Dear Rose Mary,
>
> I'm sorry to hear that you do not consider that notice of these meetings has been adequate.
>
> We have found that newspaper notices actually do very little to get the information out there and instead we have started relying more on our website, Facebook / twitter accounts, and other information sharing networks such as the elected members of Wicklow County Council, the Wicklow Public Participation network and the Economic Think Tank network.
>
> There our information strategy involved:
>
> Newspaper notices: The list of public meetings was first published in
> the local papers in the week starting Monday 28th December and then again the following week starting 5th January. (We do not 'take' our ads from the paper - we create them and pay the papers to publish them!) In our advert of November 2015 we also advised that public meetings were to be held in January and that interested parties should keep an eye out for further notifications.
>
> Councillors: All were informed of meeting dates on 22nd December 2015
> and ask to share with their networks / constituents
>
> Online: The schedule was placed on the website / Facebook page etc on

> 22nd December
>
> Community networks: All local community groups and the Enniskerry
> Forum were informed on 30th December
>
> Economic network: Notification issued towards end of December (sorry I
> can't be more precise as it was issued by my colleagues in the LEO
> office)
>
> Local advertising: Posters were erected in Enniskerry on 31st December
>
> The purpose of the meeting is to inform the public about the existence of a draft plan, explain the processes, explain the contents and how to make a submission. Therefore if you miss your local meeting, there is nothing that you will have missed that you cannot received individually if you just give me or one of my team a call or call down to the planning office.
>
> Is mise le meas,
>
> Sorcha
>
>
> Sorcha Walsh
> A/ Senior Planner | Planning & Development Wicklow County Council |
> Station Road | Wicklow Town | Co. Wicklow
> : 0404 20100 | : 0404 69462 | : swalsh@wicklowcoco.ie
>
>
>
>
> -----Original Message-----
> From: Rose Mary Craig [m.
> Sent: 07 January 2016 13:33
> To: County Secretary - Group
> Subject: WCC Development Plan 2016 onwards
>
> Dear Sir or Madam
> I note that a list of consultation dates for the draft WCC Development Plan has been announced.
> I would like to ask when this list was published as it seems that the list on your site is taken from an ad in the Wicklow Times (I think).
> I have just got an alert yesterday (not from the WCC) for the Enniskerry meeting today and I think that this is very little notice for such an important document. Also the list of dates does not appear very prominently on your website....in contrast to a list of collection points for Christmas Trees!
>
> I look forward to you replying with the requested information.
> Thank y,ou
>
> Rose Mary
> **********" This message is intended only for the use of the person(s) (\\"the intended recipient(s)\\") to whom it is addressed. It may contain information which is privileged and confidential within the meaning of applicable law. If you are not the intended recipient, please contact the sender as soon as possible. The views expressed in this communication may not necessarily be the views held by Wicklow Local Authorities. Any attachments have been checked by a virus scanner and appear to be clean. Please ensure that you also scan all messages, as Wicklow Local Authorities do not accept any liability for contamination or damage to your systems. ********** Is d'úsáid an duine/na ndaoine chuig a bhfuil sí seolta agus sin amháin atá an teachtaireacht seo. D'fhéadfadh go bhfuil faisnéis faoi phribhléid nó faoi rún de réir bhrí an dlí is

infheidhme inti. Má fuair tú an ríomhphost seo de bharr earráide, téigh i dteagmháil leis an seoltóir chomh luath agus is féidir, le do thoil. Ní gá gurb ionann na dearcaí a léirítear sa ríomhphost seo agus dearcaí Comhairle Contae Chill Mhantáin. Tá aon iatáin seiceáilte ag scanóir víris agus dealraíonn sé go bhfuil siad glan. Bí cinnte go ndéanfaidh tusa scanáil ar gach teachtaireacht chomh maith, le do thoil, mar ní ghlacann an Chomhairle dliteanas ar bith i leith éilliú ná dámáiste do do chuid córas.

C48

Leonora Earls

From: Rose Mary Craig
Sent: 19 February 2016 15:33
To: Planning - Development Plan Review
Subject: Wicklow County Development Plan 2016 -2022

Dear Sir/Madam
I would like to make the following points in reference to the Enniskerry LAP encompassed in the Draft Wicklow Development Plan 2016-2022.

First I appreciate that the WCC is concerned with the whole county and my submission is concerned with the Enniskerry area only. As Enniskerry is a principal entry point to the amenities of the Wicklow mountains and is much visited by both day visitors from Dublin (and Ireland generally) and tourists (visiting Powerscourt and Glendalough, etc) it has an important role in enhancing the visitor experience to County Wicklow.
The Government is projecting huge growth in the numbers of overseas visitors to this island (bringing much needed revenue) and clearly these visitors have to be entertained here as we cannot simply rely on simple pleasures like sun and sea as do other countries.

Enniskerry is an attractive, much written about, easy to reach from Dublin, destination and at present I would say that most of the commercial life of the village is due to its visiting population. Residents, for the most part, leave Enniskerry to work either elsewhere in the County or,for the most part, in greater Dublin. And shop also - Bray, Greystones, Dundrum, Dun Laoghaire.

It is beyond my comprehension why the WCC has decided as I heard one planner say publicly 'Enniskerry has to have its share (of housing)' .
I would ask on what this comment is based? Given that the Regional Planning Guides do not require a County to spread its population targets (and therefore housing unit projections) all over the county. It is my understanding that the WCC has ignored the requirement of the RPG to allocate the main growth to larger metropolitan areas and has gone instead for a scattergun approach across the county, ignoring in the case of Enniskerry its topology, geology and existing infrastructure. A 77% growth in housing units by 2022 is just unbelievable.

I would question the numbers for Enniskerry both for population and projected housing units. I consider the defining lines for the 'town' of Enniskerry to be questionable with strange ommissions and inclusions in the area outlined and do not appear to be based on a set of straightforward principles. Can WCC explain how and when the lines of the 'town' were demarcated?

It seems that the zoning of certain areas is at the behest of a selection of developers with no real plan behind these zonings. And if the accompanying plan in the CDP ofr Enniskerry is to be believed, the protection of the view of the Sugar Loaf from the Cookstown Road has been dropped. This is one of the most important views in the County and should not be removed. The housing density of two of the action areas has been increased to reflect Enniskerry's 'town' status which I would suggest exactly why Enniskerry was elevated to 'small growth town' status. A place with 4 twisty narrow roads (6 if one counts the division of two of the four roads) coming into to a tight central area, 1 bus to Dublin every hour and an occasional Bus to Bray Dart Station which does not even meet up with rush hour Dart arrival times. No linkage to Luas (except at a distance in Dundrum).

Enniskerry is on the cusp of greater Dublin/Wicklow border and as such is adjacent to four if not five large scale proposed developments viz, Stepaside, Rathmichael/old Conna, Fassaroe, Carrickmines Valley and Bray Town. Any available green space is endangered. The village should have a green belt around it to protect its delicate infrastructure and key views of the Sugar Loaf, the Sea and the Scalp. New housing where appropriate should in many cases be limited to one storey as was a past requirement.

Enniskerry is located in a deep valley surrounded by water - rivers, springs, boggy land, sand and gravel and has a unique topography and geology having been formed by a glacier.
The location is inherently not stable geologically and should be the subject of environmental studies to determine its suitability before any significant development is permitted (note the area behind the RC church has been dezoned for housing due to its failure to pass new environmental standards).

Enniskerry's existing infrastructure of narrow twisting roads and steep hills on approach is not capable of handling large volumes of increased traffic which inevitably will follow new housing development both in Enniskerry and the surrounding areas mentioned above. Sight lines are also a problem and proposals to exit large volumes of traffic through narrow entrances on to narrow hilly roads near crossroad junctions are dangerous. Traffic management into Enniskerry and within the village itself is limited and not all platforms promised are even installed.

Enniskerry is a former estate village with a unique built heritage 15 miles from the centre of Dublin and attracts many citizens of greater Dublin to visit the Village, Powerscourt, the Waterfall and surrounding area. It also serves as a Gateway to the wonderful facilities and scenery of the Wicklow mountains. Cyclists and walkers use the village and its facilities. The village's attractive setting and buildings are much promoted and written about bringing many visitors which adds to the commercial health of the village. Its two rivers, the Cookstown and Dargle , have magnificent famed valleys which should enjoy the highest level of protection thus allowing them to be passed on to future generations as amenities. There are also several ancient monuments in the vicinity of national interest.

WCC should recognise the special place which Enniskerry occupies in the County, its importance to tourism and Dubliners seeking outdoor amenities (cycling, walking, horse riding) and culture and make special provision for this unique village to enhance its viability to both its residents and visitors as a pleasurable experience making a strong contribution to the national effort to make this island a place for increasing numbers of visitors .

With kind regards

Rose Mary Craig

On 13 Feb 2016, at 14:07, Joan Campbell <

Hello everybody,
I agreed to draft the Submission from WPA on the proposed new County Development Plan.
I attach a start. This only goes as far as Chapter 5. Some of you might have things to say about chapters 9 (Infrastructure) and 10 (Heritage)
I welcome your views, objections and criticisms.
Are you free to meet to discuss sometime on Sunday
Joan

<County Development Plan - draft Submission From WPA.docx>

C49

Leonora Earls

From: Malcolm Lane [r...
Sent: 19 February 2016 14:58
To: Planning - Development Plan Review
Subject: draft County Development Plan submission - CREEDON (1st Email)
Attachments: Creedon Dev Sub 2016.pdf; Location Map.pdf; Ballyknocken Submission - Activities Heritage Tourism and Sustainability - Michael Byrne 17-2-16.pdf; Wicklow County Tourism Letter of Support.pdf

FAO:

County Development Plan Review
Planning Department, Wicklow County Council

On behalf of **CREEDON FAMILY**, see attached submission for lands at Ballyknockan, Blessington.

Please find more pdf attachments on next email.

Yours Sincerely

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Submission to:

WICKLOW COUNTY COUNCIL

Review of:

DRAFT WICKLOW COUNTY DEVELOPMENT PLAN 2016-2022

In respect of:

LANDS AT

BALLYKNOCKAN

BLESSINGTON

CO. WICKLOW

Prepared on behalf of:

THE CREEDON FAMILY

By:

PD LANE ASSOCIATES

ARCHITECTURE & ENGINEERING

PLANNING & URBAN DESIGN

FEBRUARY 2016

GROUNDS OF SUBMISSION

This report, prepared on behalf of the Creedon Family, is made as a formal submission to Wicklow County Council on the review of the draft County Development Plan in preparation of the Wicklow County Development Plan 2016-2022.

This submission relates to the lands in the ownership of the Creedon Family at Ballyknockan, Blessington, Co. Wicklow which encompasses a disused granite quarry – see map attached ('the Subject Lands').

Currently, the Subject Lands are within the 'Development Boundary' of Ballyknockan Small Village in the County Development Plan (CDP) 2010-2016 (see CDP map attached). The village has a rich history based on granite quarried for almost two centuries which can be seen all around in the farmhouses and cottages of stone.

The Creedon Family have operated the granite quarry on the Subject Lands for generations. For over 170 years Ballyknockan has provided granite for many of Dublin's best known buildings (eg. offices of Dublin City Council). The village grew around the craft of stonecutting and this is reflected in many buildings in the area.

It is submitted that the Subject Lands should be designated for a small-scale Integrated Tourism/Leisure/Recreational Complex incorporating a heritage centre displaying the workings of the old granite quarry located above the historic Blessington Lakes / Poulaphouca Reservoir area. The existing historical buildings (entrance hut, quarry office & old Forge), as you enter the site can be renovated and converted for a heritage centre and/or hiking camp/hostel. Some of the remaining disused manufacturing buildings, within the quarry floor can be used for adventure pursuits eg. rock climbing and paint-balling (see attached 'Strategy' by Michael Byrne).

The site easily connects into walking trails and cycle routes in this scenic area - there are many examples of these, including the recent Blessington Greenway Walk (to be extend around the lakes), well worn treks up passed the old quarry to the nearby Silsean hilltop and St. Kevin's Way from nearby Valleymount & Hollywood.

The proposed designation for tourism/leisure/recreational use for this disused historic quarry would provide for its proper care for future generations and make it a viable and economically sustainable resource again for the community, together with preserving and generating value from its rich heritage. The proposal would be fully supported by the Ballyknockan community and Wicklow County Tourism.

STATUTORY CONTEXT

Chapter 7 'Tourism & Recreation' of the draft Wicklow County Council Development Plan 2016-2022 ('the draft 2016-2022 Plan') states that:

> *'the County's tourism and recreational attractions are important assets, which form the basis of the County's tourism industry and which are fundamental to the enjoyment of the County by both visitors and residents. Attractions range from areas of scenic beauty, which provide attractive natural bases for outdoor pursuits, such as the Wicklow mountains, which comprise mountain peaks, valleys, rivers and lakes, the coastline with long stretches of sandy beaches and dunes and the numerous woodlands. The County has a rich heritage of archaeological and historical sites, manor homes and gardens, and attractive towns and villages. In addition, there are a number of golf and resort hotels, and adventure centres, which are within driving distance of Dublin which are attracting increasing numbers and visitors and business related events.'*

The following objectives of the draft 2016-2022 Plan relate more specifically to the Subject Lands and its use as an Integrated Tourism/ Leisure/ Recreational complex and the re-use of its buildings:

> ***T1*** *To promote, encourage and facilitate the development of the tourism and recreation sectors in a sustainable manner.*
>
> ***T2*** *To ensure that all tourism and recreation developments are designed to the highest quality and standards.*
>
> ***T3*** *To generally require tourism and recreation related developments to locate within existing towns and villages, except where the nature of the activity proposed renders this unfeasible or undesirable. Within existing towns and villages, the Planning Authority will promote and facilitate the development of tourist related uses at appropriate sites.*
>
> ***T4*** *To only permit the development of a tourism or recreational facility in a rural area in cases where the product or activity is dependent on its location in a rural situation and where it can be demonstrated that the proposed development does not adversely affect the character, environmental quality and amenity of the rural area or the vitality of any settlement and the provision of infrastructure therein. The natural resource / tourist product / tourist attraction that is essential to the activity shall be located at the site or in close proximity to the site, of the proposed development. The need to locate in a particular area must be balanced against the environmental impact of the development and benefits to the local community.*
>
> ***T5*** *The Planning Authority recognises that certain tourist facilities that are located in rural areas, may be provided as stand-alone development, and that ancillary uses (e.g. club house, café, restaurant, shop etc) may be required in order to ensure the long term viability of the tourist facility. Additional uses will only be permitted in cases where the additional use is integrated with and connected to the primary use of the site as a tourist facility, and in cases where the Planning Authority is satisfied that the additional use is ancillary to the primary use of the site as a tourist facility. The additional use shall be located adjacent to the tourist facility.*

T7 *To favourably consider proposals for tourism and recreation related development, which involve the reinstatement, conservation and/or replacement of existing disused buildings. This shall be subject to all other objectives being complied with, and subject to the proper planning and sustainable development of the area. In all areas, preference will be given to the conversion and adaptation of existing buildings rather than the provision of new development on greenfield sites.*

T8 *To facilitate the provision of tourist information / interpretive centres and cultural venues at appropriate locations where they can be integrated with existing settlements or existing tourism facilities.*

T16 *To facilitate the development of hostels along established walking / hiking routes and adjacent to existing tourism / recreation facilities.*

T22 *To require all applications for development at identified or new ITLR sites to comply with the following requirements:*
• Development shall be carried out on the basis of an integrated, comprehensive master plan and business plan, to be agreed at the outset of the development with the Planning Authority;
• the development as a whole shall be held in the single ownership of the developer. In the event that certain elements of the development will require to be sold / leased to make the project viable, this shall be stated at the outset and measures proposed to operate / manage / market the entirety of the facility as a single entity;
• all development shall be so designed to respect the character of the area and any existing heritage features on the site, including demesne houses or other protected features.

T27 *To encourage eco-tourism projects or those tourism projects with a strong environmentally sustainable design and operational ethos.*

T29 *To support the development of new and existing walking, cycling and driving routes / trails, including facilities ancillary to trails (such as sign posting and car parks) and the development of linkages between trails in Wicklow and adjoining counties. In particular, to encourage and facilitate:*
• on-road cycling routes across the Wicklow Mountains;
• hill walking trails in West Wicklow;
• the expansion of the 'Blessington Greenway' around the Phoulaphuca reservoir;

Chapter 5 'Extractive Industry' states:

'EX3 To support and facilitate the development of related and spin-off industries of the extractive industry such as craft and monumental stone industries and the development of the mining and industrial tourism heritage. Consideration will be given to the development of such related industries within or in association with existing operations of worked out mines or quarries where this does not conflict with other objectives and objectives of the plan.'

Chapter 10 'Vernacular Heritage' states:

Other Structures and Vernacular Architecture Objectives BH15 To seek (through the development management process), the retention, conservation, appropriate repair and reuse of vernacular buildings and features such as milestones, stonewalls, traditional & historic shopfronts and pub fronts, thatched roofs and other historic elements. The demolition of vernacular buildings will be discouraged.

VILLAGE HISTORY

Ballyknockan Village nestles on the northwest side of the Wicklow mountains overlooking the Blessington Lakes. The village has a rich history based on the granite quarried for almost two centuries, and can be seen all around in the farmhouses and cottages of stone, the quiltwork of granite walls surrounding curiously shaped fields with large boulders protruding from them, some standing like statues. Ballyknockan is known as the rockery in the Garden of Ireland.

For over 170 years Ballyknockan has provided granite for many of Dublin's best known buildings. The village grew around the craft of stonecutting and this is reflected in many buildings in the area. The tradition of stonecutting is still carried on but on a much smaller scale than during the famine period when over 400 people were directly involved with the quarries, and the village was known as Granite City.

The granite of many impressive buildings in Dublin city and county comes from Ballyknockan, Wicklow -- 'the settlement of the hill," in Irish. Overlooking the expanse of Blessington Lake, the small village is surrounded by the heather and gorse which brightens the Wicklow Mountains. Here, quarrying has been part of a family tradition in that area. Stonecutter's cottages are embellished with their own handiwork inside and outside. Granite-quarrying and stone-cutting in Ballyknockan owe their origin to a second great wave of public building in Dublin, which began in the second quarter of the 19th century. This second wave saw the erection of many large Catholic churches with stone facades. It is likely that the first big commission awarded to Ballyknockan was for the stone used for the Jesuit Church of St. Francis Xavier in Gardiner Street. It is said that the Jesuits supplied the Ballyknockan men with their first cart for drawing the stone, and it was called the 'Francis Xavier' in honour of the good fathers.

Ballyknockan granite is of very high quality and its white-grey colour in particularly distinctive. Apparently the old practitioners of the craft referred to the granite as 'the oatmeal' because it was so white and speckled. In the days of hand-cut stone the workforce in the various quarries numbered several hundred men. Each quarry had its own forge and blacksmith, whose fires were almost always burning for the creation and repair of vital metal tools. Associated workers, carters, transported the stone to Dublin, on their distinctive long low-backed drays through rain, hail or snow.

WALKS / TRAILS

Blessington Greenway Walk, Blessington

This walk links the historic town of Blessington with the Palladian mansion at Russborough House. The trail starts at Blessington and leads south along the shores of Blessington Lakes and through forest and natural woodland. The Greenway commences at Avon Ri Activity Centre at the southern end of the town and weaves its way along the shores, crosses an ancient medieval Ringfort, uses the footpath along part of the N81 before turning back into the forest at Burgage Moyle lane. It then crosses the Valleymount Road (R758) and makes its way to Russellstown Bay adjacent to Russborough House. Along the way you will have the opportunity to appreciate the magnificent scenery and wildlife in the area.

The new development covers 6.5 km of walks and cycling trails through the forest and woodlands, taking in some spectacular scenery adjacent to the Blessington Lakes shoreline. The Greenway also links Blessington town to the Palladian mansion of Russborough House. It is planned that further phases will now be developed and will continue around the lakes for another 50kms looping back to Blessington.

Blessington Lakeside Walk 2

The existing tracks around Blessington Lakes have been extended with this new one on the south western shore near Valleymount. This is a virtually level track without any climb. You may approach either from the Blessington / Baltyboys or from the Wicklow Gap / Valleymount direction. The walk itself starts from the car-park beside the eastern end of the Valleymount Bridge. There is an over-flow car-park on the other side of the bridge.

About a third of the way along the track there is a lane-way that heads up to Valleymount village right beside the lovely stone church. This church is exceptional in that there are excellent embellishments carved by the local stonemasons from Ballyknockan. This track was an old road that headed across Red Bog in the days before the valley was flooded.

St. Kevin's Way

St Kevin's Way follows in the footsteps of St Kevin through the hills of Wicklow to the monastic ruins in Glendalough. The main start for the route is Hollywood, however you can also start the route in Valleymount. The route is well marked and takes you through a wide variety of landscapes as it climbs towards the Wicklow Gap. From here the descent brings you to Glendalough and monastic ruins.

CONCLUSIONS

In conclusion, it is our submission that the Subject Lands be designated for an Integrated Tourism/Leisure/Recreational Complex within the 'Development Boundary' of Ballyknockan Small Village in the forthcoming Wicklow County Development Plan 2016-2022.

See attached Wicklow Tourism Marketing Plan 2015 and the Poulaphouca Reservoir Recreation Opportunities Feasibility Study and letter of support from Wicklow County Tourism that reinforce the rationale for this proposal and submission.

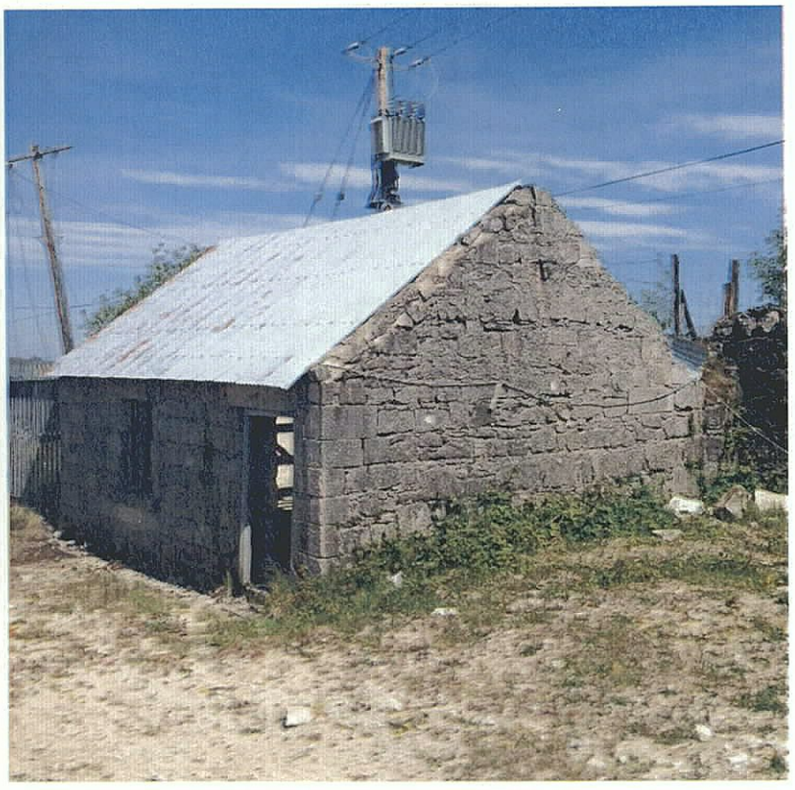
The proposed designation of this site for an Integrated Tourism/Leisure/Recreational Complex in the upcoming Wicklow County Development Plan 2016-2022 would facilitate the re-use of this historic granite quarry and its ancillary buildings, with no visual impact on the surrounding scenic area in accordance with the policies and objectives of the current county plan as laid out above.

Malcolm Lane

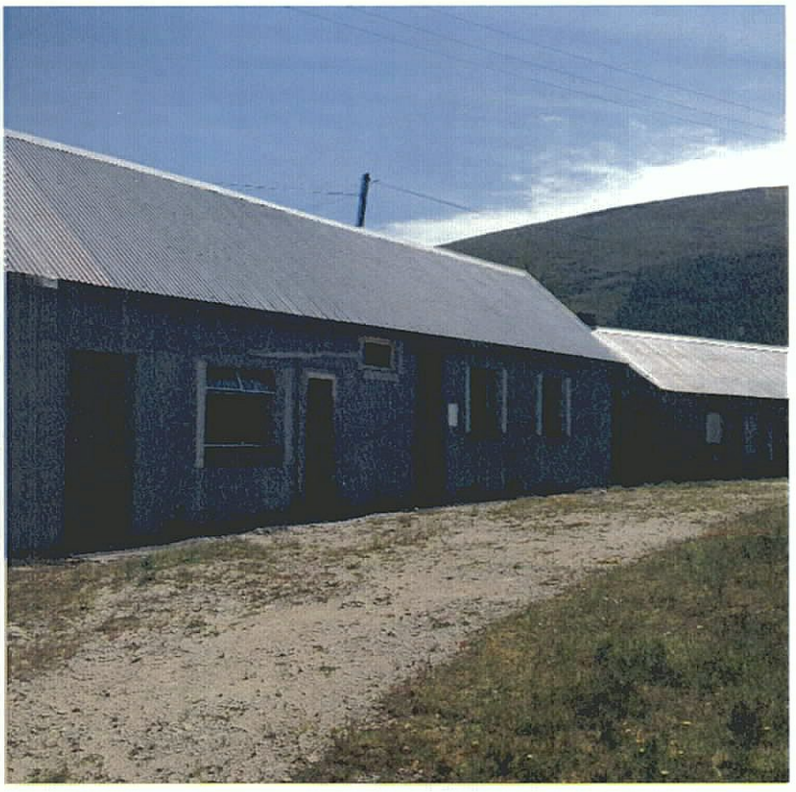
Malcolm Lane
Town Planner & Urban Designer
BA, MRUP, MA (UD)
PD Lane Associates

Appendices:
Photographs of disused quarry & buildings
Proposal for Arts/Crafts Section
Site Location Map & Plan
County Development Plan Map
Letter of Support from Wicklow County Tourism
Ballyknockan Tourism & Recreation Strategy
Poulaphouca Reservoir Recreation Opportunities Feasibility Study
Wicklow Tourism Marketing Plan 2015 (reference document)

APPENDICES



Disused vernacular Entrance Hut – potential for renovation & conversion



Old Office & disused vernacular Forge Building – potential for renovation & conversion



Disused Manufacturing buildings – potential for re-use for adventure sports



Quarry rock face – potential for rock-climbing

Proposal for Art/ Craft Section

The basic proposal is to have a number of Art and Craft Studios, a Gallery & Shop to display the art and craftwork in, and a Workshop Space.

Art and Craft Studios

There will be an option for the studios to be open access, ie. members of the public can watch the artists working, and interact or ask them questions if they wish. This often increases public interest and leads to sale of artwork etc.

Initially we will get a prefab unit that is divided into 4 or 5 rooms and kit it out with sinks, lighting and everything needed to serve as an art studio. We get in a selection of artists and craft workers that have relevance to the surrounding area, ie. granite worker, metal worker, wood worker, visual artists etc. Further down the line we would like this to lead to purpose built units, like a row of one room art studios with a larger adjoining shop/art gallery and a workshop room. Or possibly all of the above fit into one of the existing sheds.

Shop/Gallery

The shop can stock local crafts from the surrounding quarries and art/craft workers, as well as the artwork of the resident artists. The gallery space will also be available for solo art exhibitions, and can be rented by any artist. It will be a unique setting for exhibition openings with the interesting surroundings. In between exhibitions it can house the artwork of the resident artists. It will be an additional interest to offer tourists and schools alike.

There are several examples of this type of set-up running successfully all over the country. Examples that we've looked at so far are Temple Bar Gallery and Studios, The Factory @ Jamestown, Inchicore (which is a large factory space converted to a gallery and studios, similar to what we would do if we chose to convert one of the large existing sheds) and the Custom House Studios, Westport, Mayo. We would hope that a feasibility grant would give us the means to explore more similar ventures and talk to those in charge. This way, we can learn what works for them and what doesn't and consider any advice they may have to offer in relation to our venture.

Ballyknockan has an amazing rural setting that will be inspirational to visual artists, with views of the Blessington Lake.

The shop can also stock postcards/posters and things that will be of interest to passing tourists.

Workshop Space

The workshop space is to run art and craft classes, evening classes for adults, day classes and even summer camps for children. These can all be run in the workshop room, which will have sinks, a storage unit and tables and chairs and eventually even equipment like a kiln. There will be potential to bring painting excursions around the lake and mountains and surrounding areas. If there are buses coming in from schools, they can do an hour of adventure sports, and hour of art/craft in the workshop, and hour of heritage study etc.

BALLYKNOCKAN

TOURISM & RECREATION

STRATEGY

Prepared on behalf of:

Creedon Family

By:

Michael Byrne

B.A, (Hon) Outdoor Education

Dip (Hon) Outdoor Adventure Mgmt

February 2016

Author's background

Michael Byrne is an outdoor adventure and outdoor education professional from the Blessington area. He has been working closely with the Creedon Family on the redevelopment of the disused Ballyknockan quarries from an outdoor tourism, adventure and recreation perspective.

He has spent 18 years in the outdoor adventure and recreation industry and holds a diploma in Outdoor Adventure Management and a BA Degree (Hon) in Outdoor Education. He spent 12 years sailing and working on the Blessington lakes and working in management in the Outdoor Activities Dept. of the Avon Rí Resort in Blessington. He has many close ties to Ballyknockan itself having spent years in the area working with members of the local community.

Michael has been CEO of a National Charity "Sail Training Ireland" since it's foundation in 2011 www.irishsailtraining.com. This Charity is responsible for the development of the National Sail Training industry including support for Tall Ship events and voyages for young people, from disadvantaged backgrounds across the island of Ireland.

Context

Michael has been a key contributor to the development of the Ballyknockan concept from an outdoor tourism, adventure and recreation perspective and is committed to supporting its implementation in due course. He has met and liaised with local stakeholders including the Blessington District Forum, The Blessington Heritage Group, The Wicklow Uplands Council, Blessington Tourist Office, Wicklow County Tourism, The Wicklow Partnership and many individual stakeholders, business owners and landowners in the Ballyknockan area.

The context of this document is in keeping with the Wicklow County Tourism market research and "Marketing Plan 2015" objectives (See Appendices) and in consideration of the following Key Strategic Objectives and statements as identified in section 7.3 - Chapter 7 - Tourism and Recreation of the Draft Wicklow County Development Plan 2016-2022 as per the www.wicklow.ie website:

'Strategic Objectives

- *To facilitate the expansion of existing and the development of new tourism and recreation related development.*
- *To identify strategic sites capable of accommodating new tourism ventures while also ensuring the preservation of the natural landscape of the area.*
- *To protect Wicklow's principal strengths and capitalise on the distinct tourism and recreational attractions that are on offer – scenic beauty, woodlands and waterways, coastal areas and beaches, and built and natural heritage.*
- *To facilitate the development of alternative tourism products within the County such as eco tourism, craft / artisan centres.*
- *To preserve the character and distinctiveness of scenic landscapes as described in the Landscape*
- *Categories of the County set out in chapter 10. 132*
- *To ensure a focus on high quality tourism and recreation products.*
- *To protect the environmental quality of the County.*

Subject to the proper planning and sustainable development of an area, and subject to compliance with all other objectives of this plan, it is the objective of the Planning Authority to favourably consider development proposals that contribute towards the achievement of these strategic objectives.'

Ballyknockan Tourism & Recreation Vision

We propose that a tourism and recreational destination would be a fitting consideration for the town of Ballyknockan with particular emphasis on the Ballyknockan Quarries as the main hub of this activity.

A broadly inclusive approach to tourism and recreation in Ballyknockan will be fostered to allow the interaction of various local stakeholders so that the town and surrounding area benefits in general and so that the impact on the natural environment, heritage and local area/people will be minimal and positive.

The development of a number of key tourism and recreation attractions and facilities in the quarries will act as a hook to attract visitors to the area. The local economy in general will benefit and it is considered likely that other tourism and recreation activities may be developed as a result of the increase in activity.

For example:

The McEvoy family are the last remaining granite craftsmen in Ballyknockan using traditional methods. They have recently taken on the first apprentice since 1952 in Ballyknockan. They have expressed a very strong interest in developing a visitor's centre to display their traditional granite craft. They have also proposed the development of an educational structure so as to be able to offer apprenticeship training in Ballyknocken rather than sending new apprentices to be trained in Limerick as is required currently. Demand for their skills is fast-diminishing and tourism may offer a new focus and purpose for them to continue to maintain and develop traditional granite craftsmanship in Ballyknockan.

Within the *tourism and recreational hub* on the Ballyknockan Quarries we propose that the following attractions and activities could be created by a number of stakeholders:

Heritage interpretive centres exhibiting and exploring

- The history of the Granite Quarries in Ballyknockan (Local Heritage Groups have been consulted and have expressed a strong desire to operate this element of the hub)
- The history and heritage under the Blessington Lakes / Poulaphuca Reservoir (An important reference to this history is www.poulaphuca.com. This interactive website has been developed by local man Tom Bowen. Tom has expressed interest in supporting an interpretive centre dedicated to this history in the locality.)
- The history, heritage and ecology of the Wicklow Uplands.

These areas of history and heritage are not currently explored or exhibited in the area for the benefit of visitors and could create a very strong tourism attraction.

Walking facilities

- This would include way-marked trails being developed, in partnership with the *County Wicklow Partnership* and registered on the *National Trails Register*. The purpose of the National Trails register as per the following website is stated below.

  http://www.irishtrails.ie/National_Trails_Office/National_Trails_Register/

  The National Trails Register has been established to record all Waymarked Trails in Ireland. Any community, voluntary or public organisation may notify the National Trails Office of trail developments for inclusion on the register.

The register includes trails at various stages of accreditation and development. The National Trails Register is the basis for the trails displayed on this website. Trails at an early stage of development, or trails which have outstanding safety issues, will not be displayed.

- From discussions with Wicklow County Tourism, it has been highlighted that there is only one waymarked trail registered in West Wicklow. This means that there is only one trail that can be marketed by Wicklow County Tourism, despite the fact that there are plenty of trails in use. By working with The Wicklow Partnership to identify and mark and register trails leading to an from Ballyknockan it is possible to develop a walking hub that can be marketed to the tourism industry through Wicklow County Tourism as well as other channels.

- The trails will also link Ballyknockan with other existing or under-development trails for example: St Kevin's Way and The Greenway walking trail around the Blessington Lakes.

- St Kevins way creates a links all the way to Glendalough and this connection would create a very attractive series of waymarked walking trails for tourists and recreational users alike.

- Walking facilities in Ballyknockan may also include sanitary facilities, information and refreshments, provision of access, signs and parking and any other facilities that would make it an attractive start/finish destination for walkers.

We draw attention to the Local Government Act 2001 which provides a *"Summary of Sport and Recreation Amenities Provided for under the Act"*, the development of which is supported by the act.

Within this list the following amenities are identified amongst others:

- *walks,*
- *information and refreshment facilities,*
- *sanitary accommodation,*
- *provision of access, signs and vehicle parks*
- *utilities*

Outdoor Activity and Recreation Facilities to be considered in the quarries:

- Rock-climbing
- Bouldering
- Zip-lines
- Mountain Biking
- Archery
- Other land-based outdoor activities

Craft Centre:

- Art and craft workers could gain use of some of the existing sheds and stone buildings for workshop purposes and would be able to display and sell there ware and run demonstrations and workshops for visitors to the hub.

Sustainable Tourism and Recreation Development

An important consideration in developing the mix of activities will be the environmental impact on the land and the preservation of the heritage value of the sites. We are fully aware of and in agreement with the following statement within the **Draft Wicklow County Development Plan 2016-2022 – Chapter 7 Tourism and Recreation:** *The relationship between tourism / recreation and the environment must be managed in a way that continues to support local communities and remains viable in the long term.*

Should the land be designated for tourism and recreation we fully intend to ensure that the landscape, natural environment, heritage, flaura and fauna are fully preserved and protected. We are also committed to ensuring that the impact on local community and existing public environment within Ballyknockan is minimal and positive and that members of the local community are consulted to identify their concerns and wishes. Limiting the numbers of visitors to a sustainable level is key to this. Our policies and implementation of initiatives in Ballyknockan will be in line with the **County Wicklow Outdoor Recreation Strategy,** which identifies ways to *increase local economic benefit and enhance the health and well-being of the County's population, while also respecting the spectacular natural environment which is the source of these opportunities.*

And we identify strongly with the overall vision for outdoor recreation in Co. Wicklow that by the year 2020: *'County Wicklow has a vibrant sustainable outdoor recreation culture based on partnership, trust and mutual respect'.*

We also note that there is an existing public transport link daily from Dublin City Centre via the number 65 Dublin Bus directly to the quarries, which will facilitate visitors to the area without impact on the level of traffic on the roads. This service is currently underutilised.

Tourism

With reference to the **Wicklow County Tourism – Marketing Plan 2015** (SEE APPENDICES) the following key observations are noted from research carried out by the "Trade only marketing group" set up in 2014 to carry out market-research into tourism in County Wicklow. Item two (highlighted) is directly relevant to the proposed use of land at Ballyknockan Quarries.

The key findings in this report are:

1. *Majority of businesses in Wicklow recorded a growth in 2014 compared with previous seasons.*
2. ***Heritage/Culture & Outdoor Activities are Wicklow's main assets when it comes to attracting visitors.***
3. *Insufficient spend on marketing and promotional activities for Wicklow.*
4. *Frustration with the level of promotion Wicklow receives from Fáilte and Tourism Ireland, when compared to Dublin and the Wild Atlantic Way.*
5. *Need for greater coordination and interaction between County Council, local organisations and tourism bodies.*
6. *Calls for a more commercial approach to tourism within Wicklow in areas such as infrastructure, road signage, tourism information, public transport, parking, traffic management, etc.*
7. *Serious concerns with the increasing numbers of people staying in Dublin and visiting Wicklow as part of a day trip, as opposed to overnighting in Wicklow.*

The key objectives of the Marketing Report which followed the above research are listed below:

Item 6 is particularly relevant and highlights the focus on heritage, culture and outdoor activities as tourism objectives for County Wicklow. The proposed use of the land in Ballyknocken is directly supported by this objective.

The Key objectives from this report are:

1. *The development and implementation of an ongoing action plan to deal with the key issues raised in this document.*
2. *Fundraising campaign to create a ring-fenced budget for marketing & advertising.*
3. *Develop a coordinated approach to lobbying, to ensure Wicklow receives a more equitable share of Failte and Tourism Ireland promotion.*
4. ***Increased coordination within Wicklow Tourism and with other organisations to ensure a more commercial approach to tourism projects and potentially fast track tourism issues.***
5. *Focus on increasing the number of visitors overnighting in Wicklow versus day visitors as the main objective.*
6. ***Marketing activities and promotion to focus on the key target markets of Heritage & Culture and Outdoor Activities.***
7. *Instigate a review of the overall structure and running of Wicklow Tourism and in particular issues such as funding.*

Under Section 2 of this report – under the title "Social" the "increased demand for walking holidays" is highlight as a tourism statistic.

Although it is difficult to obtain specific tourism statistic for County Wicklow the following National statistics, included in the Wicklow County Tourism – Marketing Plan 2015 indicate strong growth in tourism. This provides a strong justification for the development of a tourism destination focused on Ballyknockan and with the Quarries as a central facility and hub of activity.

Visitor numbers from January to September 2014:

Figure 3

Visitor Origins	Ireland Visitors January 2014 – September 2014		Northern Ireland Visitors January – June 2014	
	'000s	% YOY	'000s	% YOY
Total	5,910	+9%	811	+5%
Great Britain	2,396	+9%	573	+3%
Mainland Europe	2,079	+7%	108	+2%
North America	1,065	+14%	82	+29%
ADM	370	+11%	48	+8%

Source: CSO, NISRA

250000 more visitors in 2014 (8% increase) - 7.3 million visitors 2014

Breakdown by markets: 13% new world. 26% UK. 26% US. 34% Europe

As visitors' numbers are expected to increase, the share of the various markets is expected to remain roughly similar.

Market segments: ***Culturally Curious*** *- Social Energisers -* ***Great escapers***

Note: We draw attention to the large market share of tourism in the "Culturally Curious" and the "Great Escapers" categories.

We draw attention to the relatively low level of tourism in the East and South East of Ireland, which demonstrated a need for increase facilities and amenities to attract tourism and recreational users to the region.

Where did visitors go in 2013?

Numbers (000s) ***Revenue (€m)***	**Overseas Tourists**	**Northern Ireland[11]**	**Domestic Trips**	**Total**
Dublin	3,998	460	1,344	5,802
	1,401.4	*87.0*	*255.8*	*1,744.2*
East & Midlands	772	178	932	1,882
	286.9	*28.7*	*148.5*	*464.1*
South-East	785	76	957	1,818
	203.7	*14.2*	*178.6*	*396.5*
South-West	1,860	107	1,411	3,378
	615.9	*21.6*	*313.8*	*951.3*
Shannon	931	42	669	1,642
	250.7	*5.5*	*107.7*	*363.9*
West	1,203	115	1,168	2,486
	381.2	*38.8*	*265.2*	*685.2*
North-West	506	596	630	1,732
	176.0	*109.0*	*103.5*	*388.5*

Source: CSO/Fáilte Ireland NISRA/Central Bank of Ireland

A key point highlighted in the report in relation to the above table is:

Key Point:

Dublin is the main hub to all tourists. Stronger concentration towards the West against the East

This demonstrates a need for increased marketing and networking between Wicklow based attractions and Dublin based tourist providers. This is supported by the objectives laid out in the aforementioned Wicklow County Tourism – Marketing Plan 2015. The following table demonstrate that overall Wicklow does not perform strongly in terms of attracting visitors when compared with other counties. This may demonstrate a need for high quality tourism attractions and also a willingness to engage with multiple stakeholders both locally and at County Level such as Wicklow County Tourism, Wicklow County Council, The Wicklow Partnership and Wicklow Uplands Council.

County	Total	Britain	Mainland Europe	North America	Other Areas
Dublin	3,998	1,251	1,637	772	338
Carlow	68	39	17	9	2
Kilkenny	207	42	75	72	18
Tipperary (South)	117	55	32	21	9
Waterford	225	79	61	61	24
Wexford	229	119	65	22	22
Cork	1,228	485	451	254	99
Kerry	877	154	307	333	84
Clare	485	129	126	183	47
Limerick	420	176	121	102	21
Tipperary(North)	51	28	9	6	7
Offaly (West)	9	5	2	1	1
Galway	1,028	199	426	310	93
Mayo	218	59	78	67	15
Roscommon	35	18	7	8	2
Cavan	111	78	11	17	5
Donegal	199	78	70	37	14
Leitrim	39	29	5	5	-
Monaghan	58	41	8	4	5
Sligo	133	45	47	29	13
Kildare	168	96	39	22	11
Laois	52	29	11	7	5
Longford	22	12	4	4	3
Louth	108	55	27	16	11
Meath	122	58	27	26	12
Wicklow	204	80	77	34	13
Offaly (East)	28	18	7	2	1
Westmeath	95	45	28	19	4

"" indicates less than 1,000.*
Total visits to region are less than the sum of visits to the counties because overseas visitors can visit more than one county.

The following table extracted from the same report demonstrates that Walking is the most popular activity BY FAR amongst overseas visitors:

What activities did they engage in?	**Overseas Participants (000s)**
Hiking/cross country walking	742
Cycling	241
Golf	204
Angling	127
Equestrian	99

This table is accompanied by the following Key Point:

Key Point: Walking is the most important activity visitors engage in.

Again in relation to domestic visitors the following table demonstrates that hiking/walking is the most popular activity (jointly). Heritage/ Interpretive Centres score very highly here also:

Activities engaged in by domestic holidaymakers (%)	
Houses/castles	24
Hiking/walking	24
Watersports	22
National parks	20
Visits to spas	20
Heritage/ interpretive centres	15
Gardens	15
Museums/art galleries	13
Golf	8
Cycling	8
Angling	4
Attending horse racing	4
Equestrian pursuits	2

Source: Fáilte Ireland Domestic Omnibus 2013

Again the following diagram demonstrates that vast popularity of hiking and walking with overseas visitors to Ireland. This demonstrates that by facilitating walkers, Wicklow and specifically Ballyknocken and the Blessington area have the potential to benefit from greatly increasing visitors.

Activity product usage among overseas visitors in 2013 (Failte Ireland figures)
Figure 26

Table 1 – Overseas visitors engaging in activities

	Angling	Cycling	Equestrian	Golf	Hiking/Walking
Nos. engaging (000s)	127	241	99	204	742
Expenditure (€m)	100	232	97	217	650

Key Points: Hiking/walking more than three times any other activity and revenue.

In support of our proposal to designate the lands in Ballyknockan Quarries for the purpose of tourism and recreation we wish to draw attention to the County Wicklow Sports and Recreation Policy 2004 items:

4.1.2. Provision of Facilities

1.6 The Council will promote and develop recreation and leisure opportunities within the natural environment ...

1.7. The Council will recognise countryside recreation as a growing area of leisure activity and ensure that the new and developing facilities for countryside recreations within Wicklow are resourced, provided, managed and supported in a strategic way. ...

1.8. The Council recognises the value and extent of the Wicklow Uplands as a recreational resource and the increased interest in hillwalking and outdoor leisure pursuits.

4.1.3. Planning

1.0. The Council will ensure a planned approach to the provision of sport and recreation facilities, based on sound assessments of current and future needs for strategic, specialist and local facilities and guided by the research findings of this policy document.

1.3. The Council will ensure that within all Local Area Plans (LAPs) appropriate and sufficient land is clearly identified for amenity and sporting and recreation uses ...

Conclusions

In consideration of the potential activities and attractions outlined above, the supporting strategies and policies identified we request that the proposal for designation of the quarry lands in Ballyknockan for tourism and recreation purposes be given favourable consideration.

We are committed to the sustainable development of both tourism and recreational activities and the preservation of the historical and heritage value on and around the lands.

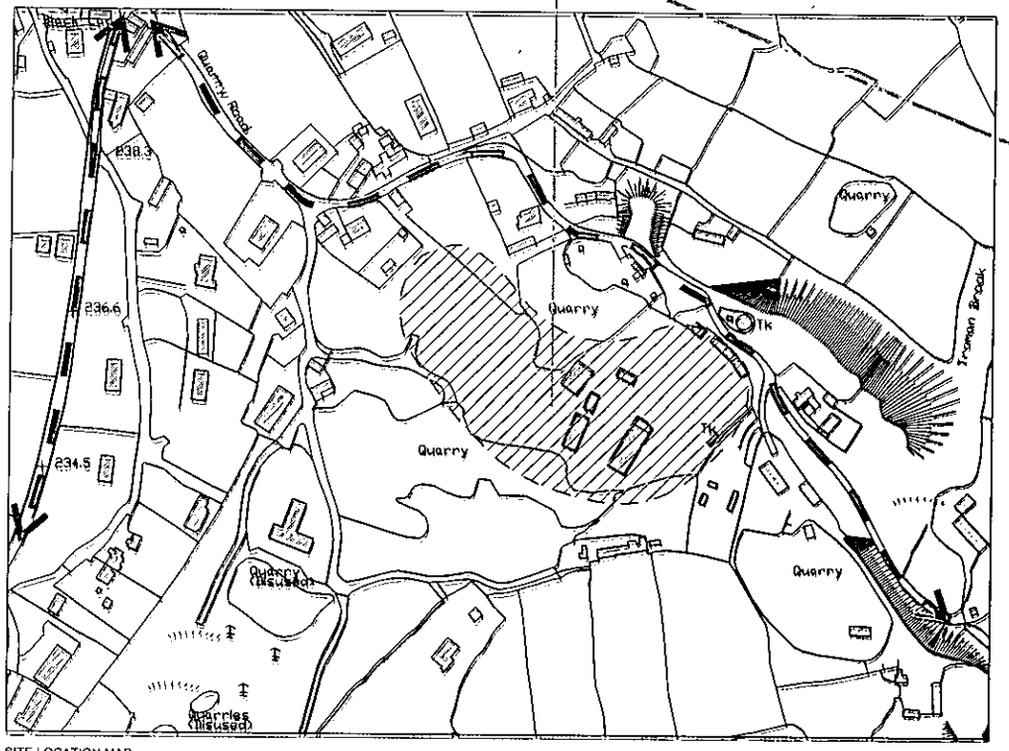
We intend to give great consideration for environmental and local impact and to minimise this in every way possible.

We are also committed to consulting with all of the relevant bodies and experts before any implementation of planned activities takes place to ensure that the final product is suitable, sustainable and favourable to the local community.

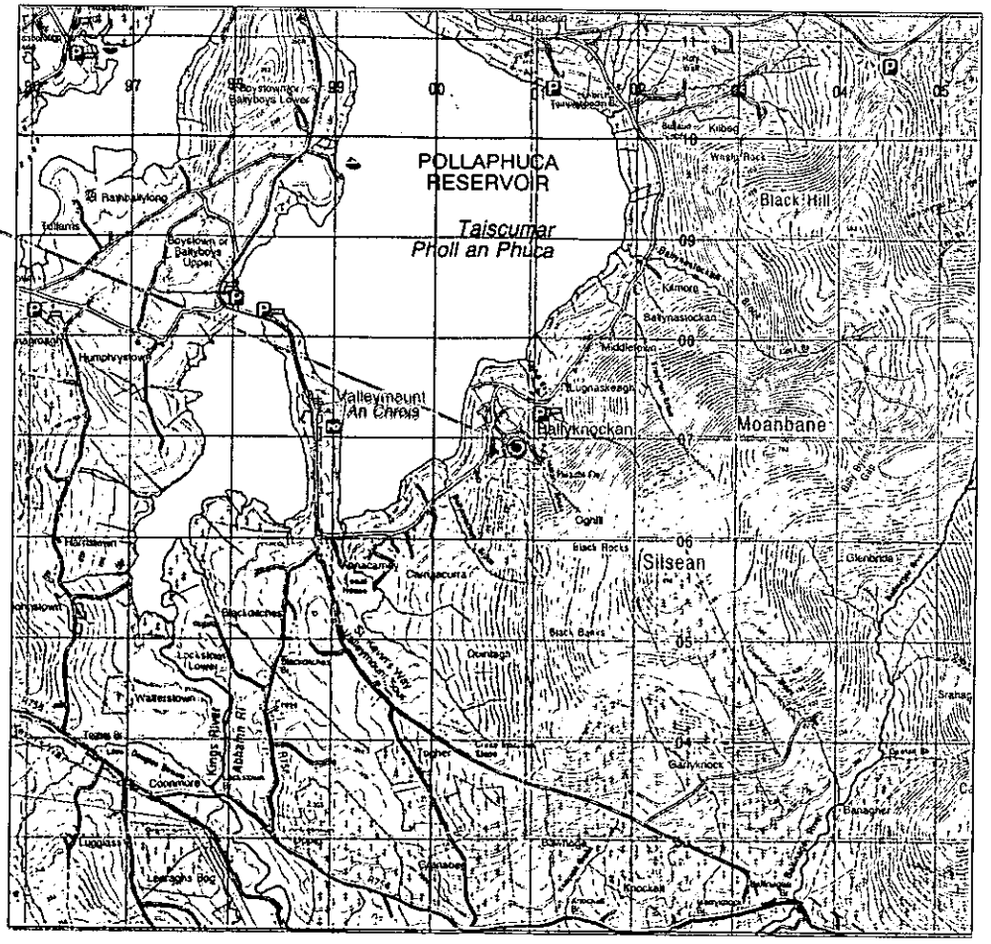
Michael Byrne
B.A, (Hon) Outdoor Education
Dip (Hon) Outdoor Adventure Mgmt
Contact Details: (086) 0346038
Michael.byrne@irishsailtraining.com

Date:
February 2016

SITE



SITE LOCATION MAP
Scale 1/3000



SITE LOCATION MAP
Scale 1/50000

LEGEND

- Subject Lands
- Quarry Buildings
- Hiking Trail to Silsean
- Cycle Route around lakes

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GENERAL NOTES

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PROJECT	Ballyknockan Submission, Blessington , Co. Wicklow.
CLIENT	Creedon Family
DESCRIPTION	Location Map
STAGE	
DATE	16-06-2015
SCALE	1 : 3000
DRAWN BY	
DRAWING NO.	
REVISION NO.	

Leonora Earls

From: Malcolm Lan[illegible]
Sent: 19 February 2016 15:01
To: Planning - Development Plan Review
Subject: draft County Development Plan submission - CREEDON (2nd Email)
Attachments: Blessinton Feasibility study exec sum .pdf; Rural%20Settlement%20Boundaries.pdf; WCT_marketing_plan_2015 (1).pdf

FAO: 2nd Email with attachments

County Development Plan Review
Planning Department, Wicklow County Council

On behalf of **CREEDON FAMILY**, see attached submission for lands at Ballyknockan, Blessington.

Yours Sincerely

Malcolm Lane
PD Lane Associates

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County Wicklow Outdoor Recreation Strategy Vision.

County Wicklow will have a vibrant and sustainable outdoor recreation culture based on partnership, trust and mutual respect.

Poulaphouca Reservoir Recreation Opportunities Feasibility Study

Executive Summary
June 2010

Prepared by:
Humphrey Murphy
ILC

Introduction

The Co. Wicklow Outdoor Recreation Strategy consultation process, identified the potential of West Wicklow and in particular the Blessington area as a hub for outdoor recreation activity.

As part of the delivery of the County Wicklow Outdoor Recreation Strategy, County Wicklow Partnership contracted ILC in September 2009 to undertake an outdoor recreation feasibility study for the Poulaphouca Reservoir area.

The aim of the study is to fully evaluate the options for the development of the Poulaphouca Reservoir and the immediate surrounding area as a hub for outdoor recreation activity.

This report is based on a series of site visits to the Blessington area, an extensive consultation process with agencies, residents and sports participants in the period of September 2009 to March 2010, site visits to other similar facilities in Ireland and the UK and a desk research process.

While mainly focused on the central resource of the Poulaphouca Reservoir, this report also considers the surrounding land based outdoor recreation resources of the area.

Executive Summary

The aim of this study is to evaluate the options for the development and management of recreation on Poulaphouca reservoir and the immediate surrounding area, which support the designation of Blessington as a hub for outdoor recreation activity.

This study is one of a series of steps towards the sustainable development of outdoor recreation in the Blessington area. It identifies the local natural, built and human outdoor recreation resources and challenges, so as to inform future strategic and operational decisions.

Definition

Our understanding of the term "outdoor recreation" is as per the County Wicklow Outdoor Recreation Strategy definition for "Countryside Recreation":

Countryside Recreation applies to those sporting recreational and holiday pursuits based on the use of the resources of the countryside and which contribute to healthy active lifestyles. The term countryside includes land, water and air. The term recreation in this context in applies to sporting and recreational activities, which operate in the countryside as defined above. It does not refer to sporting activities which take place in the countryside on confined courses or pitches specifically designed and constructed for those sports e.g. Golf, football, show jumping etc.

Context

Blessington is less than an hour from most parts of Dublin and is a gateway to the Western edge of the Wicklow Mountains. The nearby mountains, forests and the Poulaphouca reservoir are its primary local outdoor recreation resources.

The majority of land suitable for outdoor recreation is owned by state agencies, in particular the ESB, Coillte and the Wicklow Mountains National Park. The ESB owned Poulaphouca reservoir is the main outdoor recreation asset of the area and fourteen ESB sanctioned organisations use it as a base for outdoor recreation.

Suitability

The Special Protection Area (SPA 004063) designation limits the nature and scale of activities on or near the reservoir. To date outdoor recreation activities, have not had an adverse effect on the populations which this SPA designation seeks to protect.

The generation of electricity and the supply of drinking water from the reservoir, is not affected by outdoor recreation, however recreation activities there encounter some limitations due to occasionally very high or very low water levels.

The Blessington area is a suitable venue for some high level outdoor recreation training and participation activities, but when compared to East Wicklow, the area is more suited to beginner and intermediate enthusiast type participation. This enthusiast type participation typifies a significant cross section of the Irish population and visiting tourists. Hence the area is suitable for a range of outdoor recreation activities and also a significant proportion of the domestic population and visiting tourists.

The narrow country roads and secluded nature of the area to the East of the Poulaphouca reservoir are part of its charm. Any significant increase in visitors to this area may have a negative impact on this seclusion and this requires careful management.

Demand

- Over 1.3 million people live within an hour's drive of the Blessington area.
- Health, tourism and sports trends, demonstrate an increased awareness and demand for outdoor recreation in Ireland.

This combination of positive participation trends and a significant nearby population, predispose the Blessington area to increased outdoor recreation demand. The UK outdoor recreation experience indicates that Ireland is in the early stages of outdoor recreation growth.

Development Issues

No assumptions are made in this document regarding any right to access or use any land for outdoor recreation. Ongoing consultation with relevant landowners and the local community, are required in order to realise the additional outdoor recreation potential of the Blessington area.

Agencies such as Coillte, the ESB and the Wicklow Mountains National Park, all have land management priorities which relate to their core activities – forestry harvesting, electricity generation and conservation – rather than outdoor recreation per se. Recreation is understandably at best a secondary issue for these organisations and sites.

Negotiation with these agencies for ongoing or enhanced access to their land, requires an appreciation of their land management priorities, however these agencies must also continue to appreciate the reasonable recreation and tourism development ambitions of their host communities.

Sustainability

There are economic, confidence and environmental sustainability issues which relate to the development of outdoor recreation in the area.

From an economic and social perspective, best use must first be made of current resources such as clubs, reservoir access points, trails and commercial providers. Supporting resources already in place is more likely to increase membership and tourism throughput rather than displace them from one local resource to another. Measures to support current resources includes partnering and activity bundling initiatives or promotions such as:

- An integrated recreation facility shared between some of the clubs at the reservoir, will avoid the duplication of changing, showering, storage, volunteering and access resources while also providing strength through a larger membership cohort.

- The shared promotion and integrated ticketing (three local tourism provider activities for the cost of two), between tourism providers, increases the visibility of their offering, spreads promotion costs and adds value to the tourist's experience.

A sports and a tourism group for the area are central to developing trust and driving these initiatives.

The confidence of the key local land owners such as the ESB, Coillte, the County Council and the Wicklow Mountains National Park, is central to the development of outdoor recreation infrastructure on their property. Quality materials, effective designs and thorough construction are required, in order to minimise maintenance and maximise the life time of these resources.

The environmental sustainability of outdoor recreation activities and resources in the area, must in the first instance respect the requirements of the relevant SPA designations and also the broader environmental issues and opportunities.

The green credentials of the reservoir as a hydroelectricity generator and drinking water source is consistent with the low carbon footprint of outdoor recreation activities and this shared green agenda should be capitalised on through association, in outdoor recreation naming and branding material. The potential also exists to use the reservoir area as a reference point for green energy generation through both information resources and green energy activities for visiting schools and groups.

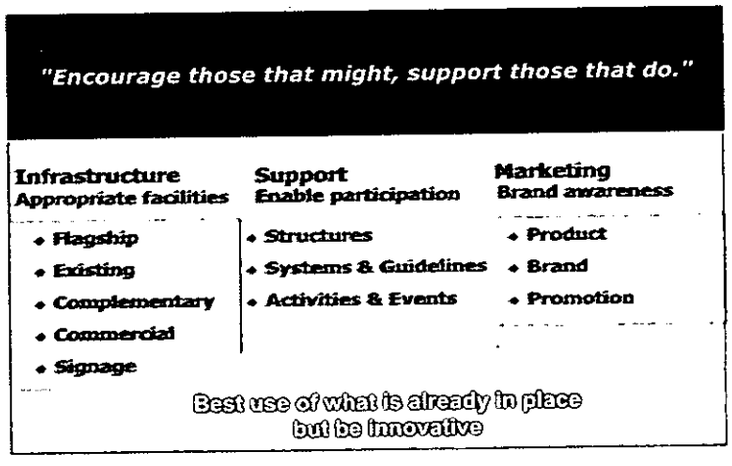
Bold innovative developments are also required to raise the tourism and economic profile of outdoor recreation in the area and drive participation.

Development Approaches

Outdoor recreation participation is dependant on community, sports and tourism involvement, all three benefit from each other. We therefore recognise the need for three key outdoor recreation development groups:

	Tourism	Community	Sports
Structure	Wonderful West Wicklow Tourism Development Group	Blessington & District Forum	Outdoor Recreation User Group
Agenda	Develop local tourism by building on existing products, services & natural assets.	Community engagement with local outdoor recreational & heritage.	A forum for outdoor recreation activity providers / organisations.
Actions	• Pursue the development of flagship & supporting tourism facilities. • Develop & promote a local tourism brand. • Develop partnerships with complementary East Wicklow & County Kildare tourism services.	• Source resources for community outdoor recreation & heritage activities. • Identify & support local outdoor recreation initiatives & champions. • Lead an annual outdoor recreation festival	• Increase communication between local outdoor recreation providers. • Identify & resolve outdoor recreation management issues for the area.

The focus of these three complementary groups is to encourage those that might take part in outdoor recreation and support those that already do. In order to deliver on this encouragement and support, the following three action areas are identified and profiled within the study.



The following are the specific actions identified as being relevant to the development of the Blessington area as an outdoor recreation hub for the resident community, relevant outdoor recreation sports groups and visiting tourism.

Infrastructure	Comment	Project Scale Time scale / cost	Project Lead	Relevant Organisations	Co Wicklow Recreation Strategy
Reservoir Multi User Trail	Cycle and walk trail encircling the central main reservoir using current roads and trails and requiring the substantial development of additional trail.	Multi year phased development. Approximately €3.5 million[1].	State Agencies	BDCF, Coillte, Commercial, WCC ESB, Failte Ireland, Land Owners, WMNP, WRP.	Objectives 1:4, 2:8
Phase one Multi User Trail	Cycle and walk trail from Burgage graveyard to the Russelstown car park.	3 – 6 months Approximately €400,000	State Agencies	BDCF, WCC, ESB, Failte Ireland, Land Owners, WMNP, WRP.	Objectives 1:4, 2:8
Visitor Hub	A focal information, changing and access point for outdoor recreation in the Blessington area.	Multi year phased development. €200,000 – 1.5m	State Agencies	BDCF, County Council, ESB, WMNP, WRP,	Objectives 2:5, 2:8
Activity, arts & heritage centre.	Ballyknocken Quarry has been identified as a potential activity base for arts, heritage and outdoor activities.	Multi year phased development. €200,000 – €600,000	Commercial	BDCF, Commercial, Failte Ireland, WRP	Objectives 2:6, 5:19
Waterbus	A tour or hop on hop off boat service on the reservoir.	2 – 4 months €100,000[2]	Commercial	Commercial, County Council, ESB, WMNP, WRP.	Objectives 2:6

[1] Cycle trail costs based on a 32 km route around the central reservoir area estimated to cost circa €110,000 per kilometre
[2] Not including the cost of docking infrastructure at Ballyknocken, Lacken, Valleymount.

Infrastructure Continued	Comment	Project Scale Time scale / cost	Project Lead	Relevant Organisations	Co Wicklow Recreation Strategy Links
Campsite	A camp and motor caravan site adjacent to the reservoir.	1 year €100,000+	Commercial	WCC, Private Landowners, WRP	Objectives 2:6, 5:9
Public Toilets	A pubic toilet adjacent to the reservoir.	1 year Sub €100,000	State Agencies	WCC	Objective 2:6
Pay n Play & Snack Facilities	Canoe, sail, bike, row boat, angling hire[3] & coffee shop at a reservoir access point.	Sub €30,000	Commercial	Commercial, ESB.	Objective 2:7
Car Park Infrastructure	Pay for use car parking to fund the installation and operation of a web CCTV security system.	3 – 6 months Sub €40,000	State Agencies	WCC, ESB WRP.	Objectives 2:5, 2:7
Kayak sail trail	A Poulaphouca kayaking sail, boat and orienteering course with supporting information.	1 – 3 months Sub €5,000	State Agencies	Commercial, ESB, Sports clubs, WLSP, WRP.	Objective1:4
Recreation & navigation guidelines, water levels & marker buoys	User friendly outdoor recreation guidelines, navigation booklet / map, marker buoys at key hazards, water level indicators.	2 – 4 months Sub €10,000	State Agencies	BRB, Commercial, ESB, Sports Clubs, WLSP, WUC.	Objective 2:7

[3] Similar hire facilities are available at the Avon Ri, additional facilities are suggested for other locations at the Poulaphouca reservoir.

Supporting Actions	Comment	Project Scale Time scale / cost	Project Lead	Relevant Organisations	Co Wicklow Recreation Strategy Links
Tourism Development	A tourism group and tourism development plan for the area.	Current Operation costs	Community	BDCF, WCC, Commercial, Failte Ireland, Kildare Tourism WRP, WCT.	Objectives 5:18, 5:19
Project Management	Development / management entity for non commercial infrastructure.	1 – 2 months Operation costs	State Agencies	BDCF, WCC, ESB, Land Owners.	Not applicable
Cycle strategy	A development study for the proposed multi use trail around the reservoir, the potential of Glending forest as a mountain-bike park & the formalising of ad hoc local mountain bike trails.	3 – 4 months	Community	BDCF, Coillte, Commercial, KCC, WCC, Failte Ireland, WRP, WUC.	Objective 2:8
Anti social behaviour management guidelines.	Anti social behaviour management plans for the area and amenities, including security and dumping.	2 – 3 months Operation costs	Community	BDCF, , ESB, Gardai, Sports clubs, WCC, WUC.	Not applicable
Outdoor recreation events	Quarterly outdoor recreation event guide and annual water festival.	1 month Operation costs		BDCF, WCC, ESB, Gardai, Sports clubs, WLSP, WUC.	Objectives 4:12, 4:12
Small craft Permit system	Day permits for small craft on the reservoir (canoes, dinghies and rowing boats.).		State Agencies	Commercial, ESB.	Objective 2:7
Volunteer Programme	A volunteer support system for outdoor recreation activities in the Blessington area.	6 months	State Agencies	BDCF, WCC, ESB, VEC, WLSP, WUC.	Objectives 4:14, 4:15

Supporting Actions Continued	Comment	Project Scale Time scale / cost	Project Lead	Relevant Organisations	Co Wicklow Recreation Strategy Links
Club / facility integration.	Examine the potential integration of some sports clubs onto a shared site.	One year Minimal costs	Clubs / Community	BDCF, Sports Clubs	
Community Outdoor Recreation Engagement	Opportunities for the community to engage with outdoor recreation, through sports, heritage and arts.	Current Operation costs	Community	BDCF, WCC, CWAO, sports clubs, VEC, WLSP, WUC.	Objectives 2:8, 4:14, 4:15, 4:16
Community outdoor recreation employment	Opportunities for local individuals and enterprises to benefit from the outdoor recreation resources of the area.	Operation Costs	Community	BDCF, WCC, sports clubs, VEC, WLSP, WRP, WUC.	Objectives 4:14, 4:15, 4:16

Promotion	Comment	Project Scale Time scale / cost	Project Lead	Relevant Organisations	Co Wicklow Recreation Strategy Links
Reservoir Web Site	An information portal regarding outdoor recreation and access issues for the Poulaphouca reservoir.		State Agencies	ESB	Not applicable
Tourism Website and Social Media.	An information portal for tourism activities and services in the Blessington area through a central website and Facebook page.	Sub €5,000	Commercial	Community, Commercial, WCT, WRP.	Objectives 4:12, 4:13
Signage & Information Panels	Branded composite direction, welcome & warning signage, map tables & information boards which identify local outdoor recreation & heritage access & amenities.	Sub €40,000	State Agencies	Community, WCC, ESB, tourism providers..	Objectives 2:5, 4:12
Brand resources & Materials	Logo, images, brand values & support material (Maps guides), to promote the area locally, amongst tourism operators & individuals.	Sub €20,000	Commercial	Community, Commercial, WCT, WRP.	Objectives 4:12

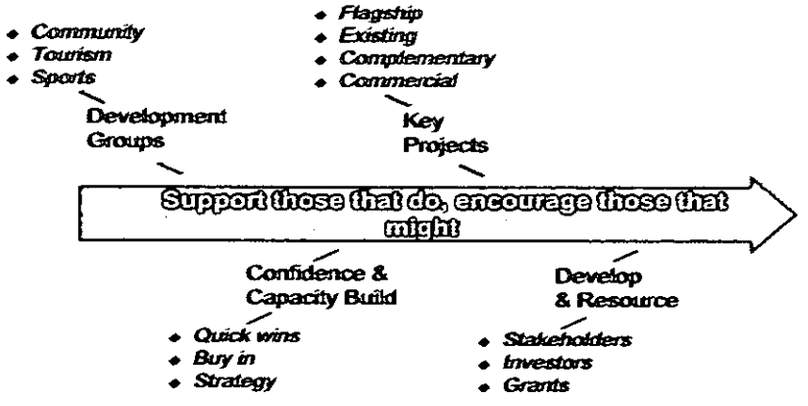
Structure	Tou Wor Tou
Agenda	Dev built

Glossary

BDCF: Blessington and District Community Forum
BRB: Blessington Rescue Boat
CWAO: County Wicklow Arts Office
ESB: Electricity Supply Board
KCC: Kildare County Council
VEC: Vocational Education Committee
WCT: Wicklow County Tourism
WLSP: Wicklow Local Sports Partnership
WMNP: Wicklow Mountains National Park.
WRP: Wicklow Rural Partnership
WUC: Wicklow Uplands Council.

Phasing

The recommended actions must be prioritised, sequenced, supported and resourced. We suggest that the initial focus be on developing adequate structures and building confidence.



Conclusion

The Blessington area is already a de-facto outdoor recreation hub. However the outdoor recreation, heritage and tourism potential of the area has yet to be realised due to a lack of opportunities, awareness and in some cases limited access.

To realise the potential of the area as an outdoor recreation hub and satisfy the rise in domestic and tourism demand for these activities, commercial, community and state agency buy in is required. This buy in is reliant on sufficient confidence in the structures and the intended strategy.

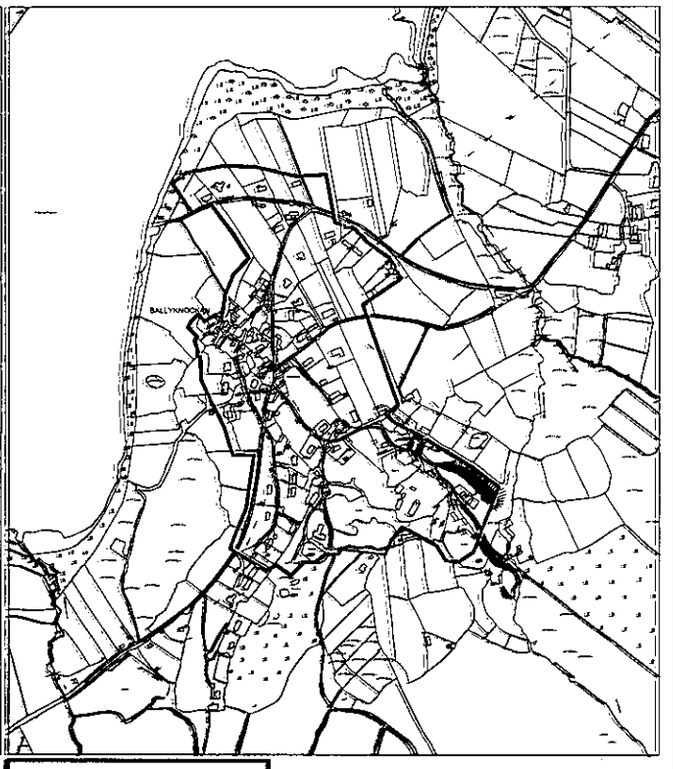
Outdoor recreation activities, infrastructure and promotion are also required to "raise the game" and create an outdoor recreation culture of a scale that will channel participation and attract tourism.

Settlement Boundaries - Small Villages

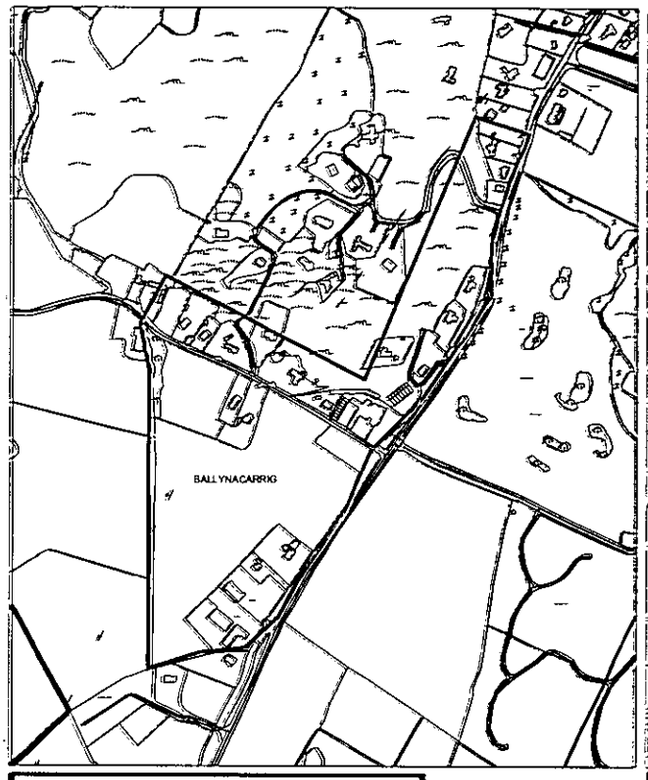
Map No. 06.03 B



Bállycoog (1:10,000)



Bállyknockan (1:15,000)



Bállynacarrig (Brittas Bay (1:10,000)



Connary (1:10,000)

LEGEND

Development Boundary

Wicklow CDP 2010 - 2016

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Wicklow County Tourism

Marketing Plan 2015

Wicklow County Tourism Ltd
Wicklow Enterprise Park
Unit C25, Wicklow Enterprise
Park, The Murrough,
Wicklow

Table of Contents

Section 1: Executive Summary p.2

Section 2: External Marketing Audit p.3

Section 3: Questionnaire Results p.26

Section 4: Current Structure and Activities of Wicklow Tourism p.37

Section 5: Marketing Mix Effectiveness p.39

Section 6: SWOT Analysis p.43

Section 7: Target markets p.45

Section 8: Marketing Mix Decisions p.46

Section 9: Action Plan p.49

Section 10: Budget p.55

Section 1: Executive Summary

In October 2014 a trade only marketing group was formed within Wicklow County Tourism. In the months that followed they prepared this report. As part of the process they sent out a questionnaire to all member of the trade in Wicklow and received over 70 responses which are detailed in this report. They also did extensive research with Failte and Tourism Ireland on the tourism industry and overall external environment. In completing the report they outlined a number of areas which WCT will focus on in the coming years and an action plan for achieving these aims. The action plan is a working document, focusing primarily on the next two to three months and will be added to and updated throughout the year.

Highlights

The key findings in this report are:

1. Majority of businesses in Wicklow recorded a growth in 2014 compared with previous seasons.
2. Heritage/Culture & Outdoor Activities are Wicklow's main assets when it comes to attracting visitors.
3. Insufficient spend on marketing and promotional activities for Wicklow.
4. Frustration with the level of promotion Wicklow receives from Failte and Tourism Ireland, when compared to Dublin and the Wild Atlantic Way.
5. Need for greater coordination and interaction between County Council, local organisations and tourism bodies.
6. Calls for a more commercial approach to tourism within Wicklow in areas such as infrastructure, road signage, tourism information, public transport, parking, traffic management, etc.
7. Serious concerns with the increasing numbers of people staying in Dublin and visiting Wicklow as part of a day trip, as opposed to overnighting in Wicklow.

Objectives

The Key objectives from this report are:

1. The development and implementation of an ongoing action plan to deal with the key issues raised in this document.
2. Fundraising campaign to create a ring-fenced budget for marketing & advertising.
3. Develop a coordinated approach to lobbying, to ensure Wicklow receives a more equitable share of Failte and Tourism Ireland promotion.
4. Increased coordination within Wicklow Tourism and with other organisations to ensure a more commercial approach to tourism projects and potentially fast track tourism issues.
5. Focus on increasing the number of visitors overnighting in Wicklow versus day visitors as the main objective.
6. Marketing activities and promotion to focus on the key target markets of Heritage & Culture and Outdoor Activities.
7. Instigate a review of the overall structure and running of Wicklow Tourism and in particular issues such as funding.

Section 2: External Marketing Audit

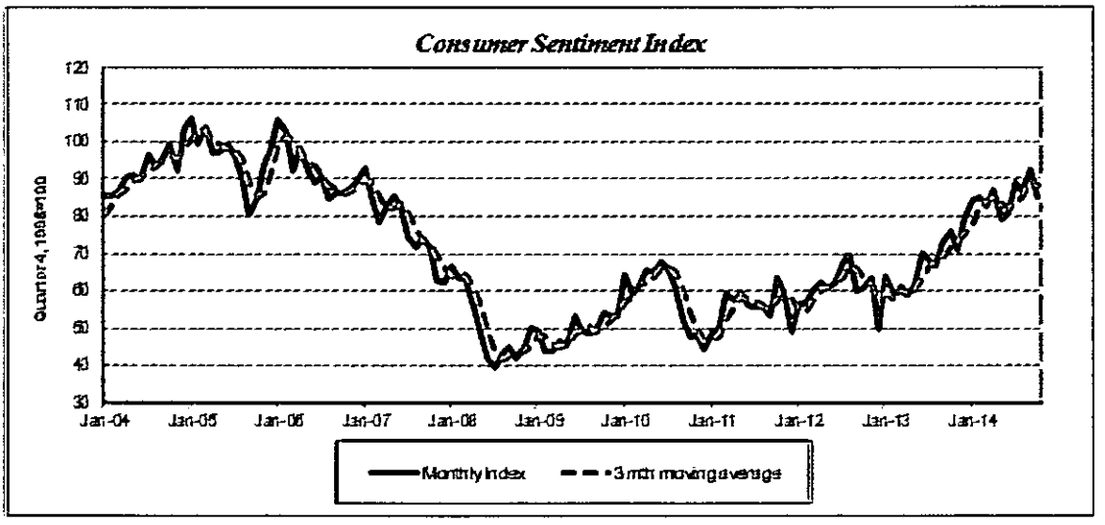
Political:

- Government maintained the 9% VAT rate.
- Objective to reach 7.7 million visitors 2015 with revenue of € 3.9 billion (best year ever!)
- Tourism Objective for 2025 = 10 million visitors to Ireland and 5 billion euro
- Failte Ireland is to develop a "Greater Tourism Region" along the South and East of Ireland that would include various destinations: Cork, Waterford & Wexford, Kilkenny, Kildare & Wicklow, and The Boyne Valley. This greater tourism region follows the success of the Wild Atlantic Way. The theme of this region is on "Heritage and Culture" with a focus on 4000 years of history. This development, when completed, will offer a fantastic opportunity to Wicklow to gain overseas exposure.

Economic:

- Increased consumer sentiment

Figure 1

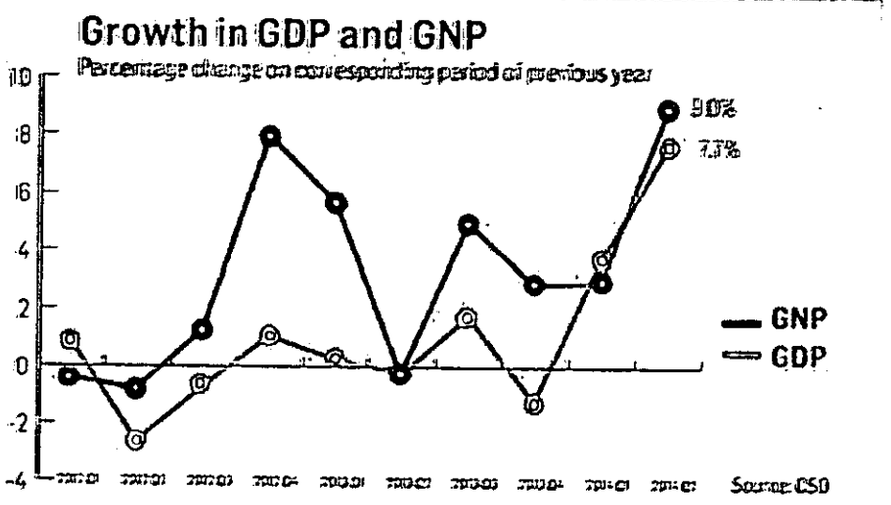


Source: ERSI (2014)

Consumer sentiment in Ireland is at its highest for 5 years.

- The Irish economy is expected to grow by its fastest rate in seven years, growing by over 7% in the year to June.

Figure 2



While many economies in Mainland Europe are still weak, with Italy falling back into recession, the UK economy is expected to grow by 2.7% in 2015, German economy by 2% and US economy by 3.2% (tourism Ireland 2015)

Social:

- Increased demand for walking holidays
- Increased focus on food quality
- Women in a relationship are the key decision makers on where to go on holiday; they assume the role of "gatekeeper" when planning a holiday and make the majority of decisions in the planning process (Mottiar and Quinn 2004).
- Potential Impact of Ebola on international tourism, most notably US market is unknown.

Technological

- 72% of consumers prefer to research their holidays online (edigitalresearch.com)
- 68% of smartphone owners use their device when travelling or planning their trip, while 70% of those preferred to use a mobile optimized site rather than an app (edigitalresearch.com). However the use of smart phones by tourists is still limited and this is primarily due to high roaming charges. Therefore while Wi-Fi is widely available, tourists are more restricted in where they access the internet while on holidays compared to at home (BDRC 2012).
- Info on when they research holiday, on go, when arrive etc. visitors awareness of the destination before they travel
- Web ireland.com 13.6 Million visitors in 2015 of which 37% from a mobile device
- Fáilte Ireland to focus on Social Media and online

Industry Analysis

Latest Visitors Numbers Figures

- Visitor numbers from January to September 2014

Figure 3

Visitor Origins	Ireland Visitors January 2014 – September 2014		Northern Ireland Visitors January – June 2014	
	'000s	% YOY	'000s	% YOY
Total	5,910	+9%	811	+5%
Great Britain	2,396	+9%	573	+3%
Mainland Europe	2,079	+7%	108	+2%
North America	1,065	+14%	82	+29%
ADM	370	+11%	48	+8%

Source: CSO, NISRA

- 250000 more visitors in 2014 (8% increase) - 7.3 million visitors 2014
- Breakdown by markets: 13% new world. 26% UK. 26% US. 34% Europe
- As visitors' numbers are expected to increase, the share of the various markets is expected to remain roughly similar.
- Market segments: Culturally Curious - Social Energisers - Great escapers

Tourism Facts 2013 (source Failte Ireland)

Tourism Numbers 2009 - 2013

Figure 4

Where did Ireland's tourists come from?

Numbers (000s)	2009[1]	2010[2]	2011[3]	2012	2013
Britain	**3,034**	**2,759**	**2,799**	**2,722**	**2,870**
Mainland Europe	**2,323**	**2,011**	**2,184**	**2,247**	**2,346**
France	*393*	*344*	*381*	*384*	*409*
Germany	*411*	*381*	*411*	*437*	*466*
Italy	*274*	*214*	*214*	*240*	*226*
Spain	*255*	*214*	*233*	*239*	*249*
Netherlands	*na*	*120*	*133*	*137*	*148*
Belgium	*na*	*65*	*83*	*81*	*95*
Denmark	*na*	*43*	*46*	*42*	*51*
Sweden	*na*	*53*	*57*	*70*	*72*
Switzerland	*na*	*53*	*68*	*78*	*73*
Austria	*na*	*41*	*44*	*46*	*51*
Norway	*na*	*45*	*51*	*48*	*50*
Poland	*na*	*166*	*161*	*159*	*152*
All Other Europe	*na*	*270*	*302*	*284*	*306*
North America	**920**	**864**	**904**	**940**	**1,039**
USA	*835*	*781*	*811*	*833*	*924*
Canada	*85*	*83*	*93*	*107*	*115*
Rest of World	**301**	**311**	**353**	**378**	**431**
Australia, New Zealand & Other Oceania	*130*	*135*	*143*	*158*	*191*
Other Areas	*171*	*176*	*210*	*219*	*240*
Total Overseas	**6,578**	**5,945**	**6,240**	**6,286**	**6,686**
Northern Ireland	n/a	n/a	1,416	1,264	1,574
Total out-of-state	**n/a**	**n/a**	**7,656**	**7,550**	**8,260**
Domestic trips[4]	8,340	7,300	7,169	7,031	7,111

Source surveys are designed to measure area of residence groupings (bold figures). Figures in italics are indicative of approximate overall market size but do not provide a sufficient level of precision to accurately reflect absolute market size or trends over time.

Figure 5

How much money did they spend?

Revenue (€m)	2009[5]	2010	2011[6]	2012	2013
Britain	**1,035.8**	**879.4**	**858.3**	**858.0**	**890.9**
Mainland Europe	**1,348.0**	**1,133.9**	**1,110.8**	**1,060.5**	**1,228.2**
North America	**724.6**	**695.1**	**677.4**	**745.7**	**829.0**
Other Overseas	**311.3**	**290.4**	**272.8**	**291.6**	**367.7**
TOTAL OVERSEAS	**3,419.7**	**2,998.8**	**2,919.4**	**2,955.8**	**3,315.7**
Northern Ireland[7]	n/a	n/a	295.8	284.3	304.7
TOTAL OUT-OF-STATE	**n/a**	**n/a**	**3,215.2**	**3,240.1**	**3,620.4**
Carrier receipts[8]	524.8	580.0	626.8	856.0	865.0
Overseas same-day visits	27.0	25.0	36.0	34.0	35.0
TOTAL FOREIGN EXCHANGE EARNINGS[9]	**n/a**	**n/a**	**3,877.2**	**4,041.1**	**4,520.4**
Domestic trips[10]	1,389.8	1,560.5	1,415.9	1,345.4	1,373.3
TOTAL TOURISM REVENUE	**5,360.5**	**5,164.3**	**5,293.1**	**5,386.5**	**5,893.7**

Source surveys are designed to measure area of residence groupings (bold figures).

Northern Ireland resident expenditure data provided in Stg from 2009 onwards, average annual exchange rates supplied by Central Bank of Ireland.

Source: CSO/Failte Ireland/TSB BIISAR/Central Bank of Ireland

Figure 6

Where did visitors go in 2013?

Numbers (000s) *Revenue (€m)*	Overseas Tourists	Northern Ireland[11]	Domestic Trips	Total
Dublin	3,998	460	1,344	5,802
	1,401.4	*87.0*	*255.8*	*1,744.2*
East & Midlands	772	178	932	1,882
	286.9	*28.7*	*148.5*	*464.1*
South-East	785	76	957	1,818
	203.7	*14.2*	*178.6*	*396.5*
South-West	1,860	107	1,411	3,378
	615.9	*21.6*	*313.8*	*951.3*
Shannon	931	42	669	1,642
	250.7	*5.5*	*107.7*	*363.9*
West	1,203	115	1,168	2,486
	381.2	*38.8*	*265.2*	*685.2*
North-West	506	596	630	1,732
	176.0	*109.0*	*103.5*	*388.5*

Source: CSO/Fáilte Ireland NISRA/Central Bank of Ireland

Key Point: Dublin is the main hub to all tourists. Stronger concentration towards the West against the East

Overseas Tourists in 2013

Figure 7

How did overseas tourists spend their money in Ireland?

Breakdown of Spend in Ireland (%)	Total	Britain	Mainland Europe	North America	Rest of World
Bed & board	30	32	34	27	27
Other food & drink	21	24	25	16	30
Sightseeing/entertainment	13	15	13	13	9
Internal transport	13	8	12	16	10
Shopping	12	9	12	11	22
Miscellaneous	11	12	4	17	2

Key Point: Most of the spending is done in Accommodation and Food.

Figure 8

When did they arrive?

Seasonality (%)	Total	Britain	Mainland Europe	North America	Rest of World
January-March	18	19	18	15	16
April	8	8	9	7	6
May	10	9	10	10	9
June	9	8	9	13	11
July	11	10	11	13	12
August	12	13	12	12	13
September	9	9	9	11	11
October-December	23	25	21	19	23

Source: Fáilte Ireland estimates based on CSO

Key Point: July & August are the busiest months. May is very strong as well.

Figure 9

What activities did they engage in?

	Overseas Participants (000s)
Hiking/cross country walking	742
Cycling	241
Golf	204
Angling	127
Equestrian	99

Key Point: Walking is the most important activity visitors engage in.

Figure 10

What was their main reason for visiting Ireland?

(000s)	Total	Britain	Mainland Europe	North America	Rest of World
Holiday	3,144	979	1,227	718	220
Visit friends/relatives	2,096	1,296	496	176	128
Business	1,088	549	388	92	58
Other	357	46	235	53	24

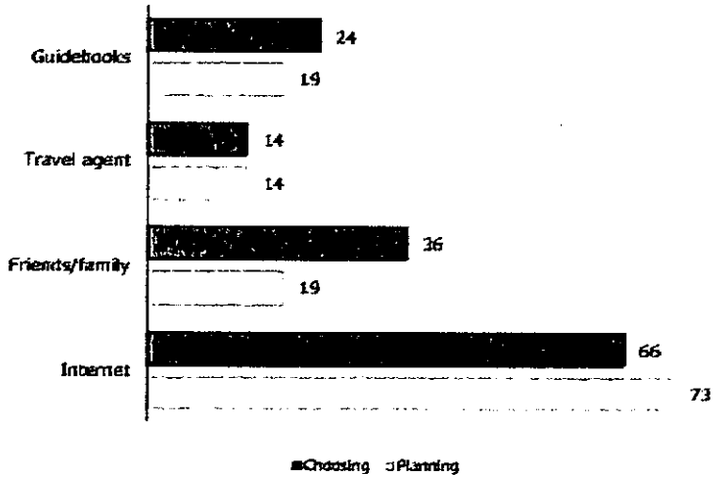
Source: CSO and NISRA

Key Point: Europe main marketing for holiday makers to Ireland

Overseas Holidaymakers 2013

Figure 11

Sources of information for choosing/planning a holiday in Ireland (%)



Source: Fáilte Ireland's Port Survey of Holidaymakers 2013

Key Point: Internet remains the strongest platform when it comes to planning holidays

Figure 12

How did they arrange their holiday?

(%)	Total	Britain	Mainland Europe	North America	Rest of World
Package*	17	9	16	27	13
Independent	83	91	84	73	87

** Prepaid an inclusive price for fares to/from Ireland and at least one other element of the holiday.*
Source: Fáilte Ireland's Survey of Overseas Travellers

Key Point: Independent travellers more important than packaged holidays

Domestic Tourism in 2013

Figure 13

Domestic trips (000s) by purpose of travel

	2009	2010	2011	2012	2013
Holiday trips	4,037	3,978	3,696	3,374	3,460
- *Long (4+ nights)*	*1,104*	*1,151*	*1,040*	*780*	*920*
- *Short (1-3 nights)*	*2,933*	*2,828*	*2,656*	*2,594*	*2,541*
Visiting friends/relatives trips	2,712	1,997	2,231	2,374	2,452
Business trips	608	370	350	322	341
Other trips	990	955	891	960	858
Total trips	**8,340**	**7,300**	**7,169**	**7,031**	**7,111**

Source: CSO Household Travel Surveys 2009-2013

Figure 14

Activities engaged in by domestic holidaymakers (%)

Houses/castles	24
Hiking/walking	24
Watersports	22
National parks	20
Visits to spas	20
Heritage/ interpretive centres	15
Gardens	15
Museums/art galleries	13
Golf	8
Cycling	8
Angling	4
Attending horse racing	4
Equestrian pursuits	2

Source: Fáilte Ireland Domestic Omnibus 2013

Regional Tourism Performance in 2013

Regional distribution of overseas markets in 2013

Figure 15

REGION		Britain	Mainland Europe	North America	Other Areas	Total
Dublin	Visitors (000s)	1,251	1,637	772	338	3,998
	Visitor Revenue (€mn)	243.3	604.9	302.7	250.5	1,401.4
	Holidaymakers (000s)	449	889	564	194	2,096
Midlands East	Visitors (000s)	381	214	122	55	772
	Visitor Revenue (€mn)	116.1	103.2	43.2	24.4	286.9
	Holidaymakers (000s)	93	109	78	28	308
South East	Visitors (000s)	319	224	172	70	785
	Visitor Revenue (€mn)	99.9	62.0	30.6	11.2	203.7
	Holidaymakers (000s)	140	155	138	56	489
South West	Visitors (000s)	606	628	470	156	1,860
	Visitor Revenue (€mn)	173.7	207.6	167.5	47.1	615.9
	Holidaymakers (000s)	266	455	384	105	1,210
Shannon	Visitors (000s)	332	247	280	72	931
	Visitor Revenue (€mn)	91.3	62.0	86.5	10.9	250.7
	Holidaymakers (000s)	111	182	239	56	588
West	Visitors (000s)	270	476	353	104	1,203
	Visitor Revenue (€mn)	78.0	136.9	150.2	16.1	381.2
	Holidaymakers (000s)	128	368	281	82	859
North West	Visitors (000s)	262	127	85	32	506
	Visitor Revenue (€mn)	88.8	51.5	28.2	7.5	176.0
	Holidaymakers (000s)	81	91	62	19	253
National	Visitors (000s)	2,870	2,346	1,041	432	6,689
	Visitor Revenue (€mn)	890.9	1,228.2	829.0	367.7	3,316
	Holidaymakers (000s)	979	1,227	716	215	3,137

Key Point: Poor performance of the Midland East (us) against all other destinations except North West

Overseas visitors (000) to counties in 2013

Figure 16

County	Total	Britain	Mainland Europe	North America	Other Areas
Dublin	3,998	1,251	1,637	772	338
Carlow	68	39	17	9	2
Kilkenny	207	42	75	72	18
Tipperary (South)	117	55	32	21	9
Waterford	225	79	61	61	24
Wexford	229	119	65	22	22
Cork	1,228	485	451	254	99
Kerry	877	154	307	333	84
Clare	485	129	126	183	47
Limerick	420	176	121	102	21
Tipperary(North)	51	28	9	6	7
Offaly (West)	9	5	2	1	1
Galway	1,028	199	426	310	93
Mayo	218	59	78	67	15
Roscommon	35	18	7	8	2
Cavan	111	78	11	17	5
Donegal	199	78	70	37	14
Leitrim	39	29	5	5	-
Monaghan	58	41	8	4	5
Sligo	133	45	47	29	13
Kildare	168	96	39	22	11
Laois	52	29	11	7	5
Longford	22	12	4	4	3
Louth	108	55	27	16	11
Meath	122	58	27	26	12
Wicklow	204	80	77	34	13
Offaly (East)	28	18	7	2	1
Westmeath	95	45	28	19	4

•"-" indicates less than 1,000.
•Total visits to region are less than the sum of visits to the counties because overseas visitors can visit more than one county.

Key Point: Although Wicklow performs the best against other Midlands-East Counties, it is out-performed by all other counties along the coast, from Wexford to Galway.

Overseas visitor revenue (€m) by county 2013

Figure 17

County	Total	Britain	Mainland Europe	North America	Other Areas
Dublin	1,401	243	605	303	251
Carlow	30	10	14	4	2
Kilkenny	30	11	9	9	2
Tipperary (South)	34	17	11	5	1
Waterford	49	24	12	9	5
Wexford	60	38	16	4	2
Cork	433	128	152	119	34
Kerry	183	46	56	69	14
Clare	94	31	20	37	6
Limerick	135	48	37	47	4
Tipperary (North)	19	12	4	2	1
Offaly (West)	2	1	1	*	*
Galway	308	51	115	128	14
Mayo	60	21	20	18	1
Roscommon	13	6	2	4	1
Cavan	36	23	5	8	1
Donegal	63	30	18	13	3
Leitrim	14	10	2	1	*
Monaghan	19	13	4	2	1
Sligo	44	14	23	5	3
Kildare	52	22	23	6	2
Laois	19	10	6	3	1
Longford	6	4	2	1	*
Louth	43	16	10	9	8
Meath	39	15	12	8	4
Wicklow	70	19	30	12	10
Offaly (East)	15	8	6	1	*
Westmeath	43	24	15	4	*

"" indicates less than €1mn.*
Data is based on three-year rolling averages.

Key Point: Here, Wicklow is performing better that Wexford and Waterford. Interesting to note as well that Wicklow is getting a quarter of the number of visitors to Kerry, but yet gets more revenue per visitors than Kerry.

Domestic Travel by Irish residents

Figure 18

Number of trips (000s) by main county visited, 2010 - 2013

	2010	2011	2012	2013
Total Domestic - Trips[1]	7,300	7,169	7,031	7,111
Dublin	1,116	1,279	1,392	1,344
Cork	855	837	793	740
Galway	737	686	651	739
Kerry	767	656	610	671
Wexford	580	547	481	455
Mayo	399	348	342	373
Clare	426	376	340	294
Donegal	266	272	245	269
Waterford	301	335	254	242
Westmeath, Roscommon and Longford	232	215	302	226
Limerick	192	172	169	208
Kilkenny	191	149	159	204
Kildare and Carlow	174	210	196	198
Wicklow	169	205	213	194
Cavan and Leitrim	194	161	178	192
Sligo	225	193	189	182
Tipperary	137	144	152	155
Meath	88	158	149	150
Laois and Offaly	108	124	118	146
Louth and Monaghan	142	104	100	129

[1] Data is published at county level above a threshold of 150,000 trips for most recent year. Data is amalgamated below this threshold.
Source: Central Statistics Office Household Travel Survey, Quarter 4 2013

Key Point: Poor performance against Wexford and other neighbouring counties.

Profile of overseas visitors by region in 2013

Figure 19

Main reason for visit (%)	Dublin	East & Midlands	South East	South West	Shannon	West	North West
Holiday	52	40	62	65	63	71	50
Business	19	12	10	14	6	4	12
Visiting friends/ relatives	23	43	25	18	28	20	35
Other	6	4	2	3	3	4	2

Key Point: Visitors to Midlands East are far more likely to be visit friends and relatives as opposed to holidays, double that of those visiting the west.

Figure 20

Route of entry (%)	Dublin	East & Midlands	South East	South West	Shannon	West	North West
Air from Britain	32	40	25	35	43	22	28
Air from Mainland Europe	45	29	26	32	22	33	25
Transatlantic Air	15	14	19	20	23	27	20
Sea from Britain	7	16	26	10	10	14	24
Sea from Mainland Europe	1	2	3	3	2	3	3

Accommodation used (%)	Dublin	East & Midlands	South East	South West	Shannon	West	North West
Hotel	53	27	37	45	41	34	31
Guesthouse/ B&B	8	12	22	23	20	25	20
Rented	4	3	2	6	4	5	5
Caravan & camping	*	1	2	1	2	2	2
Hostel	6	1	2	6	5	9	2
Friends/ relatives	25	50	32	21	30	23	34
Other	1	4	3	4	2	4	7

Figure 21

Use of car (%)	Dublin	East & Midlands	South East	South West	Shannon	West	North West
Car brought	5	18	22	12	9	12	26
Car hired	26	48	44	45	52	47	42
Car not used	70	36	36	44	39	41	34

Whether travelling on a package (%)	Dublin	East & Midlands	South East	South West	Shannon	West	North West
Package	19	20	28	31	30	25	25
Independent	81	80	72	69	70	75	75

Key Points:

- The vast majority of Midlands-Eats arrive by air.
- 50% of ME visitors stay with friends and relatives.
- Midlands East has the lowest % using paid for accommodation.
- While visitor numbers to Wicklow are higher than many counties, the low occupancy levels of ME would imply that many of these are day trippers.
- Almost half of ME visitors hire a car.
- ME visitors are overwhelmingly independent travellers versus package holidays.

Coach tourist numbers to Ireland 2009-2013

There were 294,000 overseas coach tourists to Ireland in 2013 **contributing an estimated €210** million to the Irish economy.

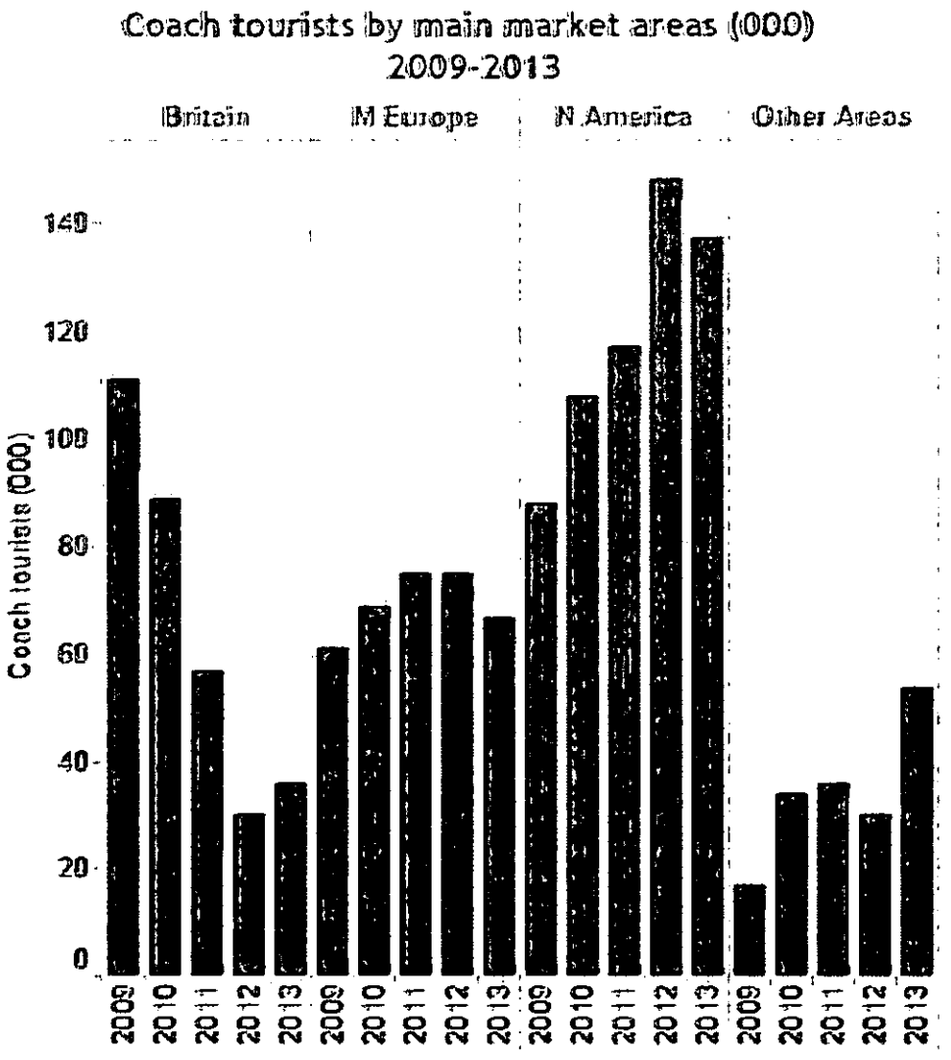
Figure 22

Total overseas coach tourists 2009-2013 (000)

	2009	2010	2011	2012	2013
Overseas Coach Tourists	278	300	284	283	294

Key Point: The top market for coach tourists to Ireland since 2010 has been North America. British coach numbers showed an increase in 2013 arresting steep declines evident since 2009. Coach tourists from long haul destinations are also showing an upward trend.

Figure 23

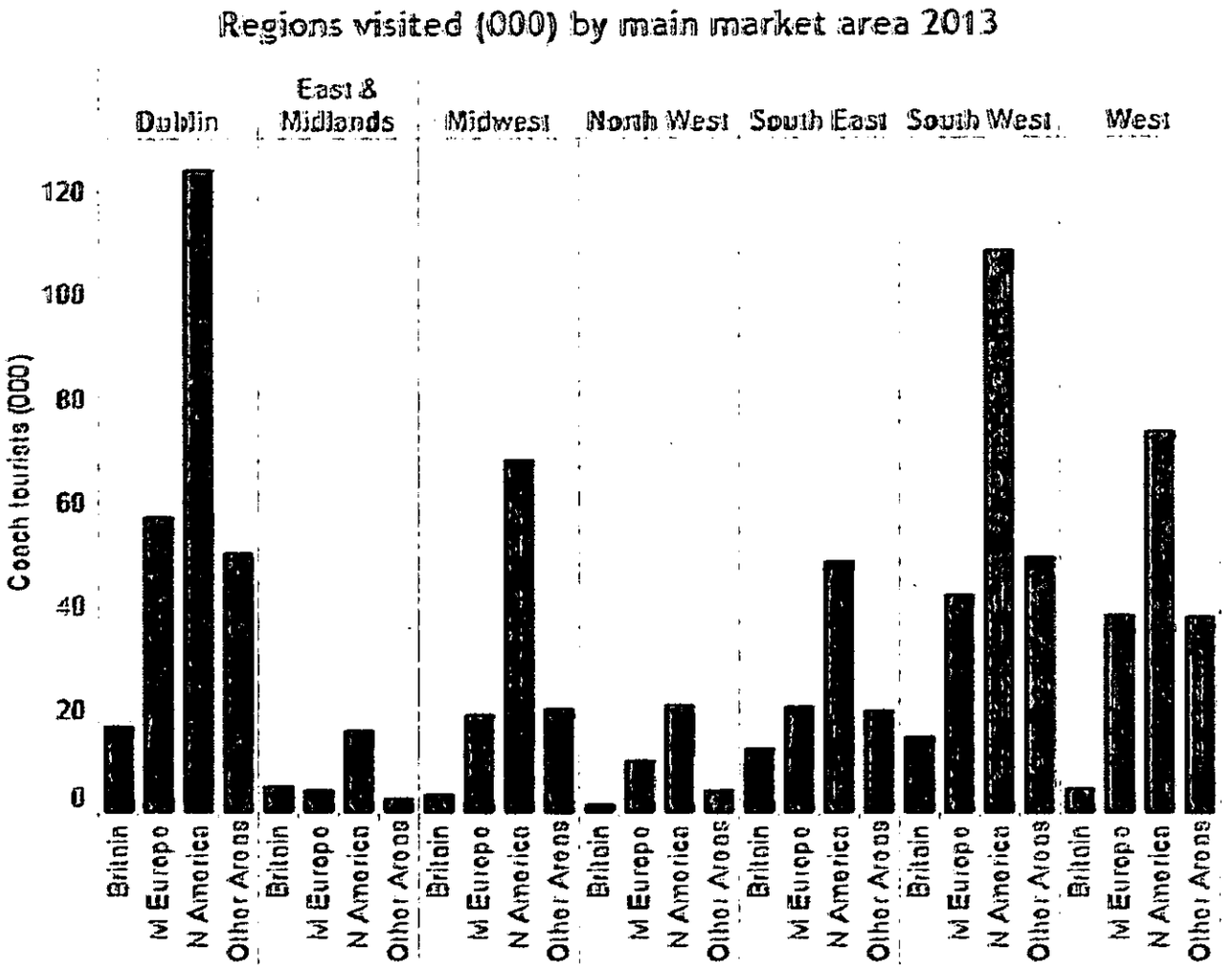


Source: Coach Tourist numbers are estimates based on data from Failte **Ireland's survey of** overseas travellers and figures provided by the sea carriers.

Regions visited

Dublin was the most visited region with over 85% of overseas coach tourists spending at least one night in Dublin. Outside of Dublin, the South West and the West were the next most popular destinations for coach tourists.

Figure 24



Source: Coach Tourist numbers are estimates based on data from Failte **Ireland's survey of** overseas travellers and figures provided by the sea carriers.

Overseas Visitors by County ('000) 1997 - 2012 (source Failte Ireland)

Figure 25

Overseas Visitors by County ('000) 1997-2012; Source Fáilte Ireland,

	2012	2009	2008	2007 (%Change from '98)	2006	1998	1997
Dublin	3,641	3,881	4,210	4,449 (+34%)	4,306	3,933	3,586
Cork	1,228	1,001	1,221	1,326 (+25%)	1,372	988	1,022
Galway	968	879	1,099	1,205 (+27%)	1,179	877	939
Kerry	826	784	959	1,048 (+3%)	1,010	1,072	1,101
Clare	445	432	607	685 (+17%)	727	570	540
Limerick	391	350	460	529 (+23%)	560	409	380
Mayo	265	314	375	340 (+15%)	308	288	298
Wexford	229	166	220	243 (-28%)	215	312	310
Waterford	225	214	300	356 (+6%)	366	336	390
Kilkenny	211	206	241	285 (+25%)	288	228	265
Wicklow	191	212	240	264 (+13%)	261	292	268
Kildare	139	158					
Meath	122	127					

- Overseas visitors to Ireland peaked in 2007. From 1998 to 2007, growth in numbers was excellent (see chart). In that 9 year period, Wicklow visitors dropped by 13% and Dublin grew by 34% to 4.449 million visitors.
- Wicklow in 2012 lowest overseas visitors were at 191,000 p.a., which was the lowest in 15 years.
- Wicklow in 1998 peaked at 292,000 visitors, however, by 2012 there had been a decrease of 100,000 (34%) of overseas visitors to 191,000.
- In 2012 Wicklow ranked 11th as a destination for overseas visitors.
- Dublin Tourism can be part of a solution to get Wicklow's overseas visitors back up to the 1998 figure of 292,000.
- Minister Varadkar plans as per Avon Ri speech is to get Dublin numbers to over 6 million.
- Blessington Lakes development (€2 million+) should be a crucial part of the plan for growth of Wicklow tourism.
- Solution for Wicklow – Co-operation in marketing offers with Dublin Tourism packages that include overnight stays in Wicklow as part of the visitors' special experience of Dublin/ Wicklow outdoor offerings.
- Globally, adventure tourism is growing at an annual rate of 65% - a plus for Wicklow's outdoor pursuits.
- We need political assistance to help influence decision makers such as Fáilte Ireland and Dublin Tourism to help us in the quest for growth in the numbers of overseas visitors to Wicklow.

Tim Kyne – Director Wicklow County Tourism
10/02/2014

Key Points: Although Wicklow has seen an increase of visitor number in 2013 compare to 2012, the table above shows overseas overnight visitor's numbers in 2012 were 35% below the 1998 figures.

Activity product usage among overseas visitors in 2013 (Failte Ireland figures)

Figure 26

Table 1 – Overseas visitors engaging in activities

	Angling	Cycling	Equestrian	Golf	Hiking/Walking
Nos. engaging (000s)	127	241	99	204	742
Expenditure (€m)	100	232	97	217	650

Key Points: Hiking/walking more than three times any other activity and revenue.

Figure 27

Table 2 – Market distribution of overseas visitors (%)

	Angling	Cycling	Equestrian	Golf	Hiking/Walking
Britain	39	18	30	42	22
Mainland Europe	51	64	39	27	55
France	*12*	*13*	*8*	*6*	*12*
Germany	*18*	*13*	*10*	*6*	*16*
North America	8	9	26	24	18
Other long haul	2	9	4	7	5

Key Points: Mainland Europe engage in more outdoor activities that any other markets

Figure 28

Table 7 - Length of stay (%)

	Angling	Cycling	Equestrian	Golf	Hiking/Walking
1-3 nights	6	11	10	19	12
4-5 nights	15	9	15	19	17
6-8 nights	33	25	27	23	30
9-14 nights	26	21	26	28	24
15+ nights	20	33	22	12	17
Average length of stay	*14.5*	*32.3*	*17.6*	*13.0*	*16.1*

Key Points: 6 to 8 nights seems to be the optimum length of stay when engaging in outdoor activities

Figure 29

Table 12 – Use of car (%)

	Angling	Cycling	Equestrian	Golf	Hiking/Walking
Car brought	36	9	8	17	13
Car hired	25	21	37	31	34
Car not used	39	70	56	52	53

Key point: visitors engaging in outdoor activities most likely do not have a car.

Figure 30

Table 14 – Nights by region (%)

	Angling	Cycling	Equestrian	Golf	Hiking/Walking
Dublin	22	51	28	41	41
East & Midlands	9	7	13	13	7
South-East	5	5	5	4	5
South-West	27	14	16	25	25
Shannon	6	6	5	7	7
West	20	14	21	6	12
North-West	12	4	11	5	4

Key point: Dublin is the biggest outdoor destination for overnight stays!?

Outdoor Activities

Figure 31

Table 13 – Regions visited (%)

	Angling	Cycling	Equestrian	Golf	Hiking/Walking
Dublin	21	58	42	48	51
East & Midlands	14	11	20	18	12
South-East	10	13	11	10	15
South-West	38	38	41	36	51
Shannon	13	15	16	20	18
West	28	34	32	17	30
North-West	16	10	8	8	8

Key point: Dublin and South West are the most visited regions for outdoor activities. It is fair to assume that a lot of Dublin activities are in fact undertaken in surrounding counties: Wicklow!

Figure 32

Table 16 – Breakdown of spend (%)

	Angling	Cycling	Equestrian	Golf	Hiking/Walking
Bed and board	20	27	26	37	25
Other food and drink	27	31	33	25	29
Sightseeing/entertainment	8	9	9	13	11
Internal transport	21	11	11	7	17
Shopping	9	17	14	13	14
Miscellaneous	15	5	5	5	4

Key Point: Most money spent on accommodation and food

Figure 33

Table 27 – Type of arrangement (%)

	Angling	Cycling	Equestrian	Golf	Hiking/Walking
Package *	8	15	19	16	14
Independent	92	85	81	84	86

**Prepaid an inclusive price for fares to/from Ireland and at least on other element of the holiday.*

Key Point: again, independent travellers is the strongest market

Other Key Points on Activities

- **Golf tourism:**
  According to Failte Ireland Golf Tourism has outperformed other key segments in the past three years averaging 6% growth per annum in the period 2009 to 2012, with 163000 tourists playing golf while in Ireland in 2012.
- **Walking:**
  - An EU report on developing destinations for walking holidays identified the following key features:
  - According to a survey by the English Tourist Board, 80% of tourists go on walks during their holidays.
  - Strong presence of women with over 50% in Germany and France, while walkers and hikers tend to be middle and upper classes, and it is very popular with the **over 50's.**
  - Increasing popularity of family walks.
  - Serious hikers or trekkers make up only 15%; the vast majority prefer walks of 2-3 hours which form a loop.
  - 90-95% goes out on their own and not as part of organized walking packages.
  - Key motivations, unspoilt nature but not wilderness, health and wellbeing, discovery and not doing what everybody else does.

Cultural product usage among overseas visitors in 2013

Figure 34

Table 1 – Numbers of overseas visitors engaging in cultural activities (000s)

Gardens	Cultural/ historical visits	Houses/castles	Monuments	Museums/art galleries	Heritage/ Interpretive centres
1,594	3,723	2,438	1,508	1,760	1,668

Figure 35

Table 2 – Market distribution of overseas visitors (%)

	Gardens	Cultural/ historical visits	Houses/ castles	Monuments	Museums /art galleries	Heritage/ Interpretive centres
Britain	19	25	20	14	16	19
Mainland Europe	45	43	43	45	45	43
France	*9*	*8*	*8*	*9*	*9*	*7*
Germany	*11*	*9*	*10*	*9*	*9*	*11*
North America	26	23	28	31	29	30
Other long haul	10	9	9	11	9	8

Key Point: The European market, again, most engaging in cultural products.

Figure 36

Table 7 - Length of stay (%)

	Gardens	Visits to sites of historical/ cultural interest
1-3 nights	16	22
4-5 nights	19	21
6-8 nights	27	26
9-14 nights	23	17
15+ nights	16	14
Average length of stay	*16.1*	*14.4*

Figure 37

Table 12 – Use of car (%)

	Gardens	Visits to sites of historical/ cultural interest
Car brought	7	6
Car hired	27	24
Car not used	66	71

Key point: vast majority not using a car.

Figure 38

Table 14 – Nights by region (%)

Nights by region (%)	Gardens	Visits to sites of historical/ cultural interest
Dublin	57	52
East & Midlands	7	8
South-East	4	5
South-West	14	15
Shannon	4	6
West	12	11
North-West	3	2

Key point: Here Dublin is the undisputed champion.

Figure 39

Table 16 – Breakdown of spend (%)

	Gardens	Visits to sites of historical/ cultural interest
Bed and board	30	28
Other food and drink	26	22
Sightseeing/entertainment	9	10
Internal transport	16	15
Shopping	13	12
Miscellaneous	6	13

Hotel occupancy

There are no figures for Wicklow but Crowe Horwath has occupancy in the Midlands and East region at 58.5% in 2013, which is the lowest of all the regions. Also in ME hotels room sales account for only 29.5% of turnover, compared to 56% in Dublin and over 35% in all other regions.

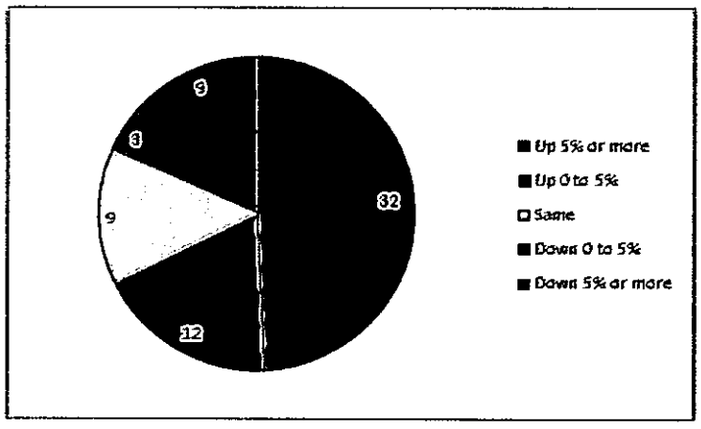
Section 3: Questionnaire Results

2014 Season's Performance

In December 2014, Wicklow County Tourism ran a survey through members of the local tourism trade. Sixty nine replies were received, and with the following findings:

How do you compare 2014 against 2013?

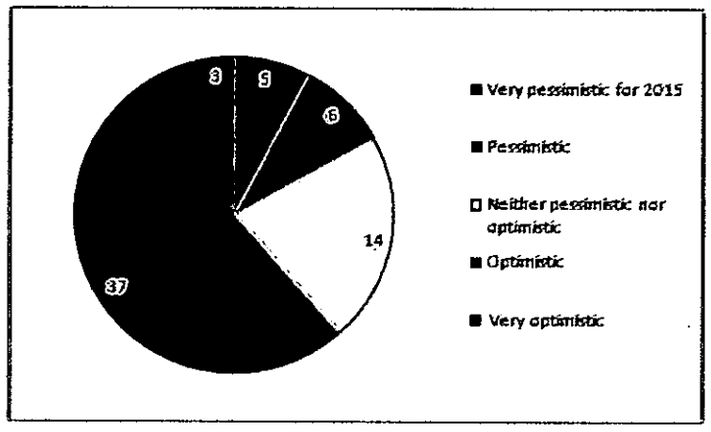
Figure 40



Section 3: Chart 1
49%= Up 5% or more
19%= Up 0 to 5%
13%= same
5%= Down 0 to 5%
14%= Down 5% or more

What is your outlook for season 2015?

Figure 41

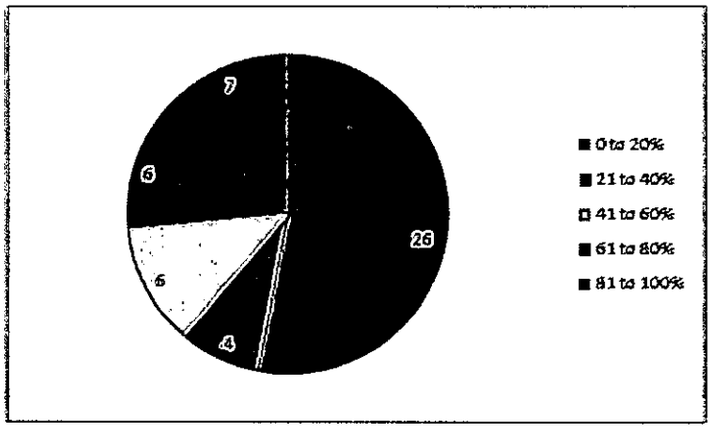


Section 3: Chart 2
5%= Very optimistic
57% = Optimistic
22%= neither
9%= Pessimistic
8%= Very pessimistic

Domestic v. Foreign Visitors

Percentage of Business from Overseas Market

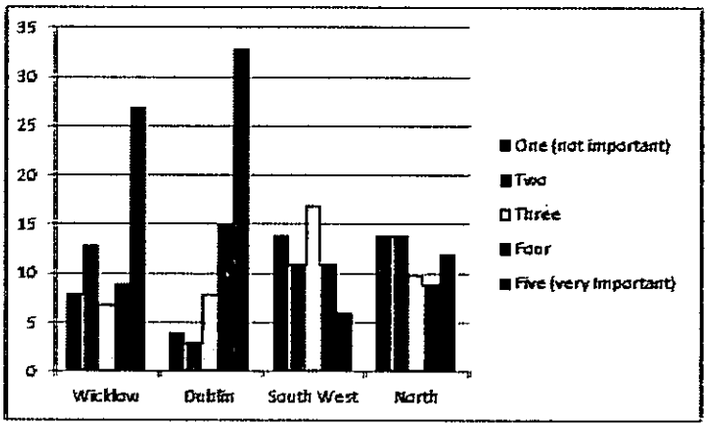
Figure 42



Section 3: Chart 3

Define the importance of the various domestic markets for your business?

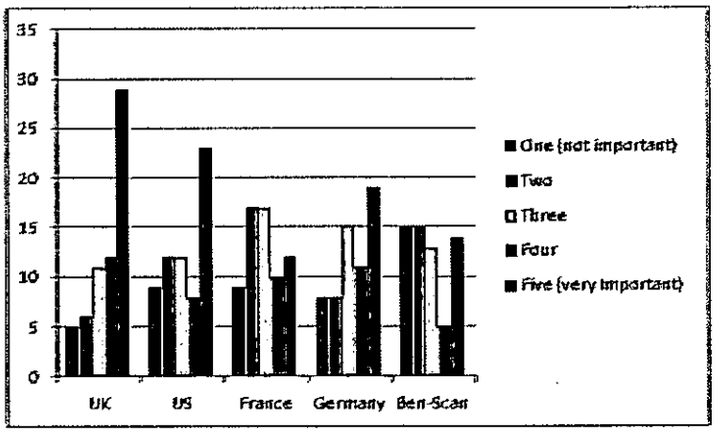
Figure 43



Wicklow and Dublin are our most important markets

Define the importance of the following overseas markets

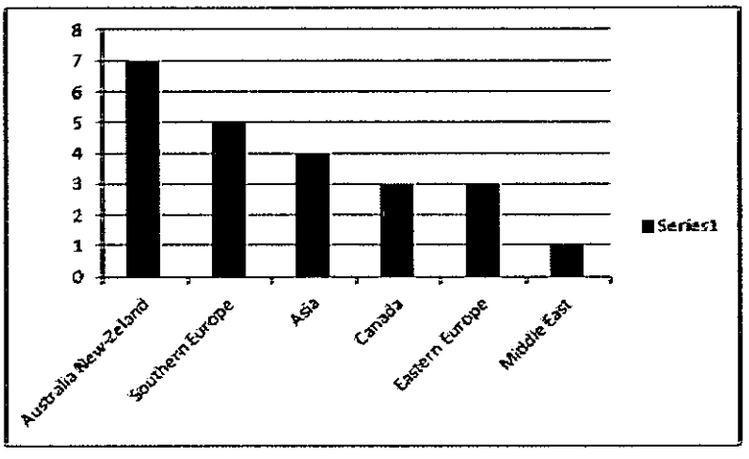
Figure 44



UK number one overseas market with US, Germany, Benelux and France

Other Countries:

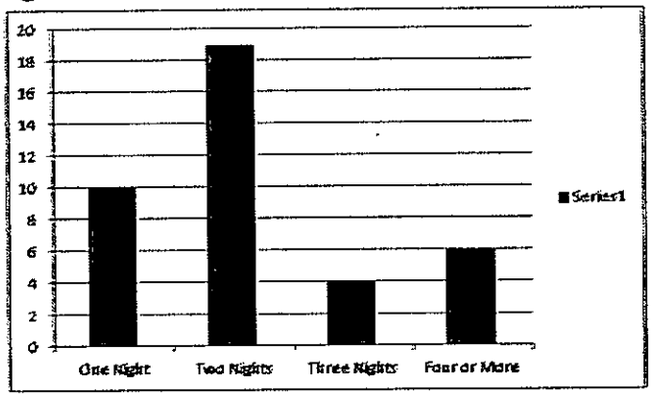
Figure 45



Accommodation Providers Survey

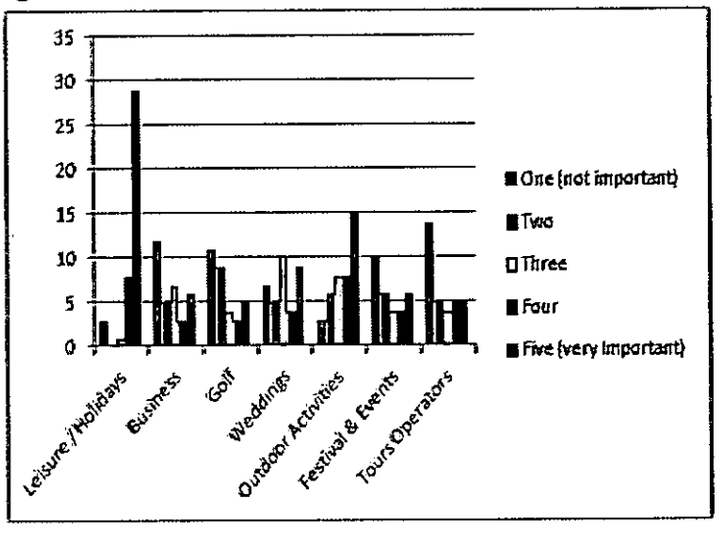
What is your average visitor's length of stay?

Figure 46



Reasons to stay?

Figure 47



1- Leisure Holidays
2- Outdoor Activities
3- Weddings
4- Business and Festivals
5- Golf & Tour Operators

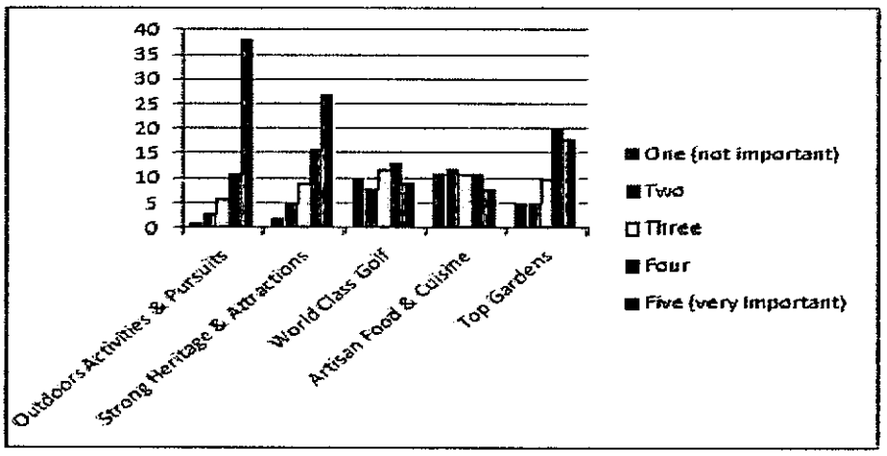
Others:

- Film
- Genealogy
- Food
- Visiting Family
- Study

Tourism Promotion

Which of the following offers the best opportunities to attract visitors to stay in County Wicklow?

Figure 48



1- Outdoor Activities & Pursuits

2- Heritage and Attractions

3- Gardens

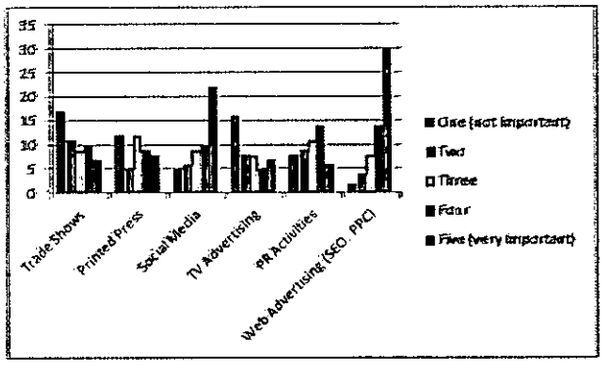
4- Golf & Cuisine

Others:

- Scenery
- Cultural Events
- Genealogy
- Film Locations
- Family Reunions
- Peace and Quiet, Relaxation

Advertising: according to you, what media is most efficient and offers best value for money?

Figure 49



1- Web Advertising
2- Social Media
3- PR Activities
4- Trade Shows - TV ads - Printed Press

Strength v. Challenges

Wicklow's key strengths when it comes to attracting visitors?

We have gathered all the various assets listed in the replies and counted how many times each was mentioned:

Attractions	75
Heritage	13
Gardens	12
Glendalough	12
Powerscourt	7
Unspecified	6
Heritage Houses	5
Wicklow Gaol	3
Villages	3
Film Industry	3
Russborough	2
Avondale	2
Genealogy	1
Blessington Lakes	1
Mount Ushers	1
Killruddery	1
Kilmaccuragh	1
Greenan Farm & Maze	1
Dining Routes	1

Activities	41
Walking	14
Outdoors	12
Golf	4
Cycling	3
Angling	2
Wicklow Way	2
Unspecified	1
Equestrian	1
Trail Running	1
Clara Lara	1

Landscape & Sceneries	67
Unspecified	32
Coast & Beaches	15
Mountains & National Park	13
Lakes	3
National Parks	2
Forests	1
Fauna	1

Lifestyle	24
Restaurants / Pubs	5
Transport	6
People	3
Uniqueness	2
Families	2
Festivals	2
Weather	1
Accommodation	1
Art Centres	1
Weddings	1

Location	46
Near Dublin	33
Near Airports & Ports	12
Near UK	1

Wicklow's key challenges in trying to attract visitors to County Wicklow?

Again, we looked at the various answers from the survey and counted how many time each issue was mentioned.

Lack of tourism promotion & development (infrastructure & marketing)	22
Day Trips / Proximity to Dublin	17
lack of Public Transport (West & Uplands)	16
Weak support from Failte Ireland against heavy promotion for West Coast	13
Lack of coordination between local players - No common objective/plan	10
Poor traditional Evening Entertainment	7
Weak overseas Exposure	6
Lack of local "on-the-ground" tourism information (Wicklow & Dublin)	6
Poor Local Tourism Signage	6
Price Competitiveness	5
Lack of outdoor activity infrastructures (cycling, walking, Angling)	3
Poor Traffic management (Glendalough)	3
Lack of all-weather attractions	3
Wrong Branding (Garden of Ireland)	3
Parking Tickets	2
Poor support from local council	2
Weak participation from tour operators	2
Weak accommodation offering	2
Anti-Social activities in uplands	2
General costs (energy, water, employment, etc.)	2
Poor interpretation of local heritage sites	2
Poor state of local roads, town & villages	2
New M11 (bypass the County)	1
Poor promotion for West Wicklow	1

Comments:

As there was such a broad range of comments and some very interesting points raised, we decided to list them all below in unedited form.

When Michael Cawley spoke at the AGM he hinted that Failte Ireland was looking at developing a package around visiting the East/South East region. This would be key to attracting and retaining visitors in our area. Without the support of Failte Ireland it will be difficult to produce a package and/or marketing strategy/package to rival the draw of the West Coast. So all of our fingers and toes are crossed that Failte Ireland come through.
Would like to see more promotion of West Wicklow
Tourism section under Wicklow Co. Co. underperforming. The development plan that was reviewed nearly 3 years ago not yet implemented. No proper planning discussions during 2014 with major road works allowed taking place in Laragh - gateway to Glendalough. Approach roads to Laragh Village neglected as regards attractive welcome signage - the attractiveness of the area left to local tidy town - VOLUNTEERs - to maintain. Traffic management required. Lack of proper parking in Laragh and Glendalough to cope with the increased interest in hill-walking. Longer term car-park required to cope with this, included in the development plan. Wicklow in general neglected in worldwide focus. Many visitors to Glendalough are amazed at the beauty - which they weren't aware of before they arrived!! The Wicklow Map is very good. More could be done to advertise the film locations - a few years ago there was a film edition of the map which was very useful.
I would like to see more advertising on T.V. at prime times. I think it would be money well used, especially abroad, taking in all the suggestions above, and I do think it is about time that Failte Ireland concentrated on this side of the country. It looks as if all the available money is been spent promoting the West.
Thanks for all the work you do for Powerscourt year-round, it is hugely appreciated!
Wicklow has (almost) unlimited potential for domestic tourism as well as foreign. If you say 'Connemara' to any French person, they will say -"aaah!" even if they have not been there, but Wicklow has to be explained before the reaction comes! As we have a Frenchman at the helm, let him translate for us the special things which would put Wicklow on the tip of the tongue for every potential visitor from France!!! ...He is already doing a fantastic job...but you did ask.....!
Keep up the good work!
WE NEED TO MARKET WICKLOW AS A PLACE TO COME & STAY AND PLAY.
Co. Wicklow deserves greater promotion of its strengths at home and abroad.
Wicklow Tourism and especially Fred Verdier and his team have always provided enthusiastic and professional support to us as a single unit of accommodation. As such, we do not have links with other businesses, where combined offers could improve our joint attractiveness to potential customers. As we are not living in Ireland, creating such opportunities is difficult.
I am trying to get a base in Bray Harbour (a pen) to work from 2015 (somewhere to store equipment and groups to change in) I need a small area, a container and a porta cabin to operate from, this would establish the business and people would start to associate Wicklow with outdoor activities Other councils in other counties do help other adventure business e.g. Surfing but I don't feel they try very hard here
Wicklow needs to become more of a destination and promoted as such. Needs more coordination and input by the trade and a carrot and stick approach needs to be adapted to busses on day trips. Council needs to actively fight for tourists, by fast tracking tourism initiatives, facilitating, festivals and other events with signage and generally making it easier for business to operate.
At any point where Wicklow Way crosses public road a sign indicating distance to nearest village or town should be erected. (this should apply to all way marked walks) At intervals along the Wicklow Way directions north and south should be indicated. I have encountered walkers on the route going south or north when they believed they were going in the opposite direction. We need more off road cycle tracks in Wicklow
This is a difficult job - why go to Wicklow rather than Dublin or Kerry. People need to experience something from coming here - maybe more friendly.

The business has only been running for a couple years and we are still in the process of developing our products, including offers.
The industry is becoming more competitive on two levels. Firstly competing with other outdoor activities which are usually cheaper and secondly with other Riding Schools of which there are many in the general area. A lot of which are smaller, and do not carry the same overheads. It is becoming increasingly difficult to run an activity based business i.e. equestrian centre, which can be a high risk sport, and dealing with the possible insurance implications of all incidents which can potentially lead to a claim.
Well done with the Questionnaire, hope we get a lot of feedback from this
Be great to see a cohesive social media promotion, similar to #dublinnow. I know there was talk of #Wickloutdoors, but how many people know if this? It would be a very low cost promotional activity, just planning, people power is free! Some free social media workshops with tourism focus could be arranged, even content specific, for example, host an event 2 weeks out from the Emerald Enduro. During the half day course participants create live, relevant content, that actually kick starts the local campaign.
I have made enough comments for now, but it is a difficult road to make progress when one considers what we have to work with, I wish you well and am willing to pull my weight with you
Framework of events in the County in the calendar year. That local community can add to during the year. ASK THE Historical society / ordnance survey about the entire heritage sites in the county. And put up on map with nearest watering hole and accommodation,
support local business much more
Thanks for all the good work
I believe that the website is the main selling point and that it does an exceptional job. One thing that might help is a special page/s with an index rather than having it at the bottom where you could miss it if you don't scroll down far enough. It can be a little slow on occasions.
County tourism should list free and grant aid marketing assistance
Promote
This survey does not really fit my business model but in a nutshell, things are steady and as a tour guide, things have been fairly good this year so keep up the good work!
The tag line 'The Garden of Ireland' becomes sadly ironic when visiting Wicklow town, the town that the county is named after has an industrial seafront blighted by refuse merchants, scrap metal dealers, dilapidated warehouses and no apparent regard for environmental or town planning. Public transportation is sadly lacking when heading South of Greystones. There is no 'cop on' from the local government or Coilte for the incredible forestry land resources that are world class for the sport of mountain biking. Only Ballinastoe wood is open to this sport whilst other hills and forested areas nearer to other towns in the county could be developed and maintained to attract more biking tourists into the county for weekends and events. Look at the South Africa, USA, Canada, Scotland, Wales and England to see just how far behind Ireland is and how much the county of Wicklow could benefit from some open minded thinking in this area.
We should try and push to have a few more cycling routes open to show off our beautiful county.
I think that I have said enough above! If you need clarification on anything or need any other feedback, then please feel free to contact me on gryan2543@gmail.com
The Glenmalure Valley Area could be better developed; and My big Issue is Road Signage through & around Rathdrum to get to Greenane & Glenmalure
Please get roads upgraded not only do the put people off coming to Wicklow they are DANGEROUS.
The success of the western way in the last 24 months is inspirational and it would be fantastic to re-energise the Wicklow Way in the same way highlighting some of our fantastic beauty spots and incorporating local historical stories.
Wicklow being so close to Dublin has great advantages also the historical A place of interest within driving distance is always a plus. The relaxation Context of our particular area brings people back year after year.
In my view Wicklow tourism creates a fantastic network with tourism body's in our county and are a very valuable service to our trade

Am looking forward to 2015 and doing my bit to promote Wicklow as a tourist destination, also looking forward to the Tourism Show in Belfast with Wicklow Tourism and lets all work together for each other's benefit.
There is a huge potential market in the U.K which is being underexploited. Especially now with the strength of sterling. The grey market (i.e. over 60s, retired) should be targered.

Section 4: Current Structure and Objectives of Wicklow Tourism

Structure

- One full time employee (Fred)
- One 4 days per week employee (Dolores)
- Three Community employment schemes (Deirdre, Kiera, Morgan)

Annual Budget:

- **Current County Council's participation: €54,000**
- **Membership revenue: €35,000**
- Advertising **sales revenue: €12,000**
- **Other fundraising activities: €2000**

What we do

- Centralise all tourism info:
  Wicklow County Tourism gathers information on all related tourism products and services in the County. That information is then sorted under the following categories: Attractions - Activities - Accommodation - Food & Drink - Shopping - Services - Events - Offers.
- Make that info accessible:
  WCT the makes all that information accessible through a variety of media platforms and promotional activities. These include: website (visitwicklow.ie), social media, print material, press, fairs & tradeshows, and more.
- Give support to local tourism projects & enterprises
  WCT is regularly involved with various partners to give support and promotion to local tourism projects. Such projects include Blessington Lakes Greenway, Bray to Greystones Cliff walk, and Tourism Ambassadors in the Glendalough area. Wicklow Tourism also gives regular marketing and promotional support to members (online marketing, social media, business development, etc.)
- Work in partnership with local, regional, National & International Tourism Organisations to help develop & Promote Wicklow as a Tourism Destination:
  Wicklow County Tourism works in partnership with various regional, national and international organisations to help develop and promote our destination. Organisations

such as Failte Ireland & Tourism Ireland, Wicklow County Council, County Wicklow Partnership, National & International Tour Operators, Local Tourism Boards, etc.

Current & Ongoing marketing activities:

- Online Marketing:
  - Website: visitwicklow.ie website is our main promotional platform. In 2014, we registered 408,515 Sessions for 1,289,669 page views (45% increases from 2013). 66% of those sessions were came from Ireland (mostly the Dublin area), 12% from the UK, 8% from the US, 2% from Germany followed by Canada and France, just above 1%.
  - Social Media: WCT is very active on social media. For example our Facebook page has: 10,500 likes and our YouTube channel registered more than 162,000 views
- Print Material:
  - Tourism Map: we print 50.000 copies of our tourism map annually. This map is widely distributed throughout Wicklow during the season. The map is also available in Dublin through Failte **Ireland's tourist o**ffices. We also send our map to trade shows and fairs here in Ireland and abroad.
  - **Annual Member's Directory: we printed 10.000 copies of our tourism Directory.** This directory is mostly destined for distribution at shows and fairs in Wicklow, Ireland or abroad. A limited supply is made available to accommodation providers in Wicklow.
- Trade Shows & Fairs:
  Wicklow Tourism regularly participates at the shows and fairs. These include the Belfast & Dublin Holiday World Shows (January), ITOA - Incoming Tour Operators (March), Meitheal – Overseas Tour Operators (April), Wicklow Town Arts Festival (May), Groove Festival (July), Tinahely Agri Show (August), Hollywood Fair (August). In 2015

- Tourism Information Points:
  Wicklow Tourism is setting up various tourism information points in partnership with local businesses that store some promotional material and offer their customers the opportunity to browse our website. We already count 7 locations around Wicklow.

Section 5: Marketing Mix effectiveness

Price:

- The weakness of euro particularly with UK market, means there is exceptionally good value now with guests from the UK, US and developing markets

Promotion:

- Failte Ireland South and East Campaign is due to be launched in the first half of 2015.
- Overall **spend on marketing Wicklow is low, with less than €20k actually spent on** marketing activities. Of this 20k, the bulk of it was spent on maps, directories, trade shows and brochure distribution. The effectiveness of these forms of marketing is questionable.
- The contribution by individual members of the trade to marketing Wicklow is low when compared to other similar tourism bodies.
- Research shows that women are the key decision makers in planning holidays.
- Social media focus by Failte Ireland with an emphasis on new content and a complete move away from any form of print marketing, such as guides, newspaper ads etc.
- Failte Ireland focus for Wicklow is on the culturally curious, social energiser and great escapers.
- Dublin is the main hub for tourists visiting Ireland and primarily their first port of call.
- Wicklow overseas visitor numbers have seen massive declines with a 2013 figures showing a 35% drop from 1998 levels, the biggest decline of all counties.
- Internet far and away most used form of advertising used by Wicklow Tourism members.
- Overseas exposure of Wicklow poor.
- Survey of the trade showed that on the ground tourism information in Wicklow is lacking, calendar of events etc.
- Cohesive and coordinated approach to advertising and promotion required. Previous promotions, such as the Wicklow Pass fell short as they were never fully embraced by the trade.
- Wicklow Tourism website has a strong performance in terms of visitor number but is dated.
- There is a demand within the trade for a high profile Wicklow ad campaign.

Process: (how we do things)

- Historically there has been a poor trade involvement in Wicklow Tourism. However the development of marketing subcommittee attempts to increase trade involvement.
- Midlands East second lowest performing region for visitor numbers and holiday makers, second only to North west, which given the proximity to Dublin, is particularly disappointing. However Wicklow is the best performing of the Mid East counties for visitor numbers.
- Failte Ireland figures show that number-wise Dublin is the biggest outdoor activity provider, however many of these activities take place in the surrounding counties, but visitors are opting to stay in Dublin.
- There are no reliable and up to date occupancy figures for county Wicklow
- There is no county wide central method for obtaining feedback from visitors to Wicklow, and as such no real information on customer satisfaction etc.
- Overall there is a general feeling within the trade that there have been low levels of investment in tourism both in terms of infrastructure and marketing spend.
- The trade in Wicklow are frustrated with the perceived priority given to the West coast over the East coast in Failte Ireland promotion.
- There is significant support for increased coordination among the various bodies operating within the county. One example of this which was raised is the fact that Bray and Wicklow tourism are two separate bodies.
- The trade feels there is significant scope for a more commercial approach from the county council and a better appreciation of the need to react quickly when in some cases stream line the decision making and application process. Issues such as signage, parking, road calming, hedge cutting, planning for tourism infrastructure and signage for one off events were all raised as issues which should be treated with priority by the council.
- Wicklow county council subvention to Wicklow County Tourism has been cut from 210k to 54k.
- **A significant portion of Wicklow Tourism's time is spent on admin duties, such as** gathering membership contributions, the map, and directory. There is effectively nothing spent on advertising or attracting new visitors to the county. All PR is done in house and has only a local reach, so again while it may be effective in informing local people of **what's happening, its benefit in attracting visitors is limited.**

Place: (how it is distributed or sold)

- Overwhelming majority research holidays on the internet, while the internet is also increasingly used to while on holidays to research.
- Wi-Fi is very important for internet users while abroad.
- Failte Ireland research shows that many visitors become aware of the wild Atlantic way on arrival in Dublin airport.
- According to Failte Ireland, independent travellers are 8:1 versus package. This is supported by the trade questionnaire, with significantly low levels from tour operators.
- Vast majority of Midlands East visitors arrive by air.

- Lowest % of paid for accommodation

People:

- The vast majority of the trade saw their business improve in 2014, and more than half were optimistic but cautious for 2015.
- Wicklow tourism is staffed by one full time and one part time person.
- **The design of Wicklow Tourism's board with both local representatives and trade present,** means Wicklow Tourism is uniquely designed to have the kind of coordinated joined up approach required.

Product:

- In all the research the challenge of increasing numbers of visitors to the county opting for a day trip as opposed to an overnight stay was raised. Increasing numbers of the trade want a carrot and stick approach by council to this.
- There is increasing demand for walking holidays, and Failte Ireland research says it is the biggest activity engaged in. Walking has a strong presence of women, people from middle and upper end of the market and **the over 50's. Increasingly the demand is for** family walks, walks of 2-3 hours which form a loop.
- Failte Ireland research says that US, UK and Europe are still the key markets and thus is likely to remain unchanged into the future.
- Mainland Europe visitors are more likely to engage in outdoor activities.
- Outdoor activities visitors are unlikely to have a car.
- Most of the spending by visitors is in accommodation and food.
- Trade in Wicklow is still very much seasonal and based around key months of March to October.
- Failte Ireland research on domestic travel shows Wicklow performing poorly, 169k visitors versus Wexford 580k.
- **Coach tourist's numbers show that numbers visiting Midlands East is the lowest.**
- ME joint second last for walking nights by tourists, only 7% actually stay in Wicklow and cycling, however third for golf.
- Golf tourism outperformed all other sectors in 2012.
- **European market is the most engaging in the cultural product. However they don't wish** to use a car, and therefore again Dublin is the biggest destination.
- Hotel occupancy in Midlands East is the lowest in the country.
- International business is accounts for less than 20% of the business of the trade surveyed, with vast majority of business form the domestic market, with Dublin far and away the biggest market. Regarding the overseas market, the UK is number 1 by a long way, US second and Germany third, followed by the rest of Mainland Europe.
- Overnight visitors to Wicklow are primarily short stays of 1-2nights.
- Leisure holidays and outdoor activities main reason followed by weddings.

- The trade in Wicklow felt the key strengths of Wicklow are the attractions available, followed by the landscape and scenery, then the location to Dublin, and the availability of outdoor activities, primarily walking. Of the attractions gardens, Glendalough and heritage generally came out top.
- One of the biggest weaknesses highlighted by the trade was the poor evening entertainment available, and in particular the lack of traditional music etc.
- Failte Ireland have identified the potential of N81 and N11 as touring routes/loops through the county and South and East promotion is likely to focus on these.

Physical evidence:

- Frustration in the trade about ongoing signage issues and overall lack of investment in tourism infrastructure. Similar frustration with issues around traffic management and the state of the roads on the main tourist routes.
- Excellent public transport available into the county, particularly from Dublin airport and Rosslare ferry port, but a lack of public transport within the county.
- Vast majority of walkers prefer 2-3 hours which form a loop and they can go on their own without guide, while serious walkers account for only 15% of market.
- Many of the towns are in particularly poor condition, with boarded up shop fronts. The questionnaire form the trade highlighted Wicklow and Arklow town as being in particularly poor condition and argued it takes from the garden of Ireland tagline.
- Lack of available mountain biking routes and of a green belt area to rival the likes of the ring of Kerry or the Westport route.

Section 6: SWOT ANALYSIS

Strengths

- WCT website strong performance.
- Improved performance by bulk of the trade in 2014.
- Unique design of WCT board means structure in place to develop a coordinated approach between elected officials, trade and other organisations.
- All of the outdoor activities, listed by visitors are available in abundance in Wicklow.
- Landscape and scenery in Wicklow is as good as anywhere in the country.
- With Glendalough and Powerscourt Wicklow has some **of the country's most popular** attractions.
- Plenty attractions to choose from
- Proximity to Dublin.
- Excellent public transport available from both Dublin airport and Rosslare ferry port along the N11.

Weaknesses

- Marketing spend by WCT is low. Advertising and PR spend is effectively zero.
- Outside of the website, what small levels of advertising, PR and marketing are done, appear to have a largely local reach.
- A large portion of WCT time consumed by administrative duties.
- On the ground tourism information is limited.
- Website is dated.
- Low levels of trade involvement in WCT.
- No available room occupancy figures or visitor feedback.
- Low level of investment in tourism infrastructure, typified by the cut in the annual subvention, issues with traffic management, parking, signage etc.
- Frustrations around the speed in which tourism matters are dealt with within council, such as signage for one off events. Calls for a more commercial approach and a greater realisation of the commercial value of tourism.
- Low levels of coordination between different interest groups within the county.
- High level of daytrips versus overnights.
- Wicklow share of domestic market low, similar weak performance with coach tours, Walking and cycling holidays.
- Limited evening entertainment and no coordinated approach to it, particularly the availability of Irish music.
- Poor public transport within the county.
- Lack of available mountain biking routes and greenways for cycling and walking.

Opportunities

- Increased visitor numbers to Ireland, and Dublin is the main hub.
- Launch of Failte Ireland South and East campaign
- Increased consumer confidence and return to growth.
- Weakness of the Euro.
- Vast majority now research holidays on the internet, with Wi-Fi vital while abroad.
- Independent traveller 8:1 versus package.
- Increasing demand for walking holidays.
- Potential for N11 and N81 loop.
- Demand for 2-3 hour walking and cycling routes, which are safe and can be done without a guide.

Threats

- Mainland Europe economies flat
- Midlands East one of the lowest performing regions.
- Perceived priority given to the West and Dublin over the east coast by Failte Ireland.
- Coach tours not overnighting in Wicklow.
- Outdoor **activities visitors don't want to use a car.**
- Many of the major towns in poor condition.

Section 7: TARGET MARKETS

Domestic:

The domestic market can be split into three geographical locations, with Dublin, being the main market and Northern Ireland the rest of Ireland accounting for the rest.

Overseas:

The largest overseas market are the UK, Mainland Europe and the US.

In targeting both the domestic and overseas market, our research indicates that overwhelmingly, no matter if they are domestic or overseas the two primary activities visitors to Wicklow engage in are outdoor activities, with walking being by far and away the largest activity and heritage and culture, which includes everything from Glendalough to gardens and houses. It will be these two areas that this plan will focus on.

Section 8: Marketing Mix Decisions

Price:

- Focus on value from exchange rate when promoting in UK and US

Promotion:

- Identify our team and ensure a strong Wicklow presence at all discussion on Kildare Wicklow and South and East campaigns.
- Look into increasing the financial contribution from the trade. A Fundraising campaign for the trade, money raise earmarked for specific marketing projects.
- Lobby council for increased funding.
- Increased social media campaign, piggy back on to similar campaigns with FI.
- Encourage greater interaction by trade with details of events, event calendar etc.
- Packages designed with key FI target groups in minds, culturally curios etc.
- Promotion and marketing initiatives aimed at taking advantage of our proximity to Dublin. Either when they search for Dublin while planning holiday or possibly on arrival.
- **Increased lobbying of our TD's to highli**ght the decline in visitor numbers and the correlation between this and level of promotion by Failte Ireland.
- Emphasis on web base marketing.
- Potential for "fam trips" for journalists to increase visibility, particularly overseas.
- PPC and other online marketing in key international markets such as UK and Mainland Europe, and particularly the outdoor activity sector.
- Use of an interactive way of providing increased information to tourists in Wicklow, **TV's in hotel and bar's, Information Points.**
- Coordinated approach to marketing Wicklow through development of an annual marketing plan, with input from the trade, so as to ensure trade commitment to initiates.
- Update of WCT website, to include booking engine.
- High profit ad and PR campaign to reassure trade of progress.

Process: (how we do things)

- Encourage trade involvement through marketing committee and marketing plan.
- Continuous lobbying highlighting weakness of Mid-East region, approach mid eats counties on same.
- Annual survey to trade on occupancy, performance and satisfaction issues.
- Visitor satisfaction survey at trade shows, online and at points throughout the county. Encourage feedback.
- Increased and more consistent lobbying of local representatives for bigger budget and focus on tourism.

- Increased lobbying of TD's on emphasis on West and Dublin.
- Increased coordination of different interest and tourist groups within the county, such as different councils, chambers of commerce, local tourist groups. The marketing plan should be used as a strategy document for all the groups, so there is a unilateral and coordinated approach.
- Work group of local representatives set up within WCT, with potential to fast track tourist decisions, issues on infrastructure, signage etc.
- Review of time spent on admin within WT and particularly the time spent gathering membership fees and ads sales.
- Engage a "full time" PR agency.

Place: (how it is distributed or sold)

- Focus on internet in marketing initiatives.
- Carrot and stick approach required to tour operators and coach operators and the overall issue of day trips.
-

People:

- Take advantage of unique design of WT to have a coordinated approach between **councillor's** trade and other representatives.

Product:

- Day trip using all the facilities with no spend needs to be addressed.
- Highlight the availability of walks and other activities and features, but then commercial approach by council, OPW etc. to selling them. Signage, secure parking, information points etc.
- Development of greenways for cycling and walking.
- Focus on key target markets. Domestic, particularly Dublin, UK ME and US.
- Great public transport along N11 from Dublin airport and Rosslare. Feasibility of public private partnership of local bus torus within the county.
- Focus on getting visitors to overnight, biggest proportion of spend.
- Seasonal trade-look to promote off season specials etc. particularly in domestic market.
- Campaign aimed at domestic market particularly Dublin
- Design a coordinated approach within areas, on availability of evening entertainment particularly in peak season.
- Design our own loops within the county focusing on the N11 and N81. Particular attention should be paid to the arteries off the loops, so as to encourage visitors to stay longer and veer off the main route. Wicklow will then be ready to capitalize once FI eventually come through.

- Focus on Wicklow's key strengths in promotion, notably the attractions available, followed by the landscape and scenery, then the location to Dublin, and the availability of outdoor activities, primarily walking. Of the attractions gardens, Glendalough and heritage generally came out top.

Physical evidence:

- Noel Keyes design of a sub group of councillors needs to become capable of prioritizing tourism infrastructure needs and fast tracking the decision processes.
- Public private transport package within the county. Interact with taxi and accommodation providers on this.
- Need for more walks throughout all areas of the county, plus commercial approach taken to these walks, adequate signage, secure parking, lighting and opportunities to promote and sell.
- Initiatives to encourage business within the towns such as Arklow and Wicklow and involvement of groups such as the Chamber of Commerce in this.
- Development of mountain biking routes and of a green belt area to rival the likes of the ring of Kerry or the Westport route, suggestions include Blessington Lakes and the Vale of Avoca to Glendalough.

Section 9: Marketing Action Plan

Promotional & Advertising Campaigns

Actions	Who	Measure of Effectiveness	Time Frame
Prepare brief and get quotes from PR agencies	Fred	Prepare brief and get a minimum of three quotes.	Feb
Prepare Brief and get quotes for two separate digital marketing campaigns, one focused on the domestic market and one on the international market.	Fred	Prepare brief and get quotes from at least three sources.	Feb
Launch of Domestic Social Media Campaign focusing on outdoor activities, heritage and culture. Look to trade for newsworthy contributions and packages.		Begin social media targeting of domestic market. Overall objective increase social media interaction.	March
Get agreement on and trade engagement in Wicklow hash tag, again focusing on the key target markets of outdoor activities and heritage and culture.	Marketing Group.	Launch of hashtag and trade buy in.	March
Gathering of a collection of vouchers from members of the trade, for use as prizes on social media and PR throughout the year, focusing on our key target markets of outdoor activities and heritage and culture.	Fred	Build up a bank of prizes for use throughout the year.	March/April
Launch of Domestic PR Campaign: focusing on outdoor activities, heritage and culture. Ongoing contribution from trade in the form of news stories and competition prizes.	PR agency and Fred.	Depending on agreement on budget, launch PR campaign. Overall objective to increase overseas bed night's to 300,000 within 5 years.	TBC
Regular monthly meeting of marketing group	Marketing Group	Monthly meeting to review action plan, update progress on the various actions and decide new ones.	Ongoing.
Research Fam. trips opportunities from overseas journalists.	Marketing Group, Fred	List opportunities	ongoing

Website & Social Media

Action	Who	Measure of Effectiveness	Time Frame
Chase County Wicklow Economic Think Tank for funding for web and online booking engine	Fred, Noel, Board	Get €8000 to cover website and online booking engine	Feb
Develop and Launch new website	Office	web live and tested	May
Plan and budget campaign.	Office	Analytics, increase traffic to website to 600,000 sessions.	End 2015
Plan and budget online campaign to increase Facebook Likes.	Office	Achieve 20,000 likes.	End 2015
New website to include section on accessibility for people with disability	Miriam, Fred	Section created	End 2015

Print Material

Action	Who	Measure of Effectiveness	Time Frame
Tourism Map:	Office	Raise €10,000 and print 50,000 maps	March
Directory: Look at options to sell directory in order to increase print run.	Office	Print 10,000 Directories	November
Coordinate Distribution	Office	Control stock	ongoing

Festival & Events

Action	Who	Measure of Effectiveness	Time Frame
Establish a calendar for Wicklow main events	Geoff, Office	Downloadable & Printable calendar	March
Define funding opportunity and support for main festival & events. Define cross marketing opportunities to fit the development of themes and brands	Geoff, Office	Meet with local festival organisers - create plan of actions - start implementing.	April / May
Create packages to fit local Festival and Events.	Office	Monthly reminder to trade- update on website	ongoing
Help coordinate and promote Traditional Evening Entertainment. Liaise with vintners.	Office	Dedicated page on the website. Printable flyer every three months.	March

Local "On-The-Ground" Exposure/Actions / Survey

Action	Who	Measure of Effectiveness	Time Frame
Develop network of tourism information points in key locations around Wicklow and potentially beyond. Research option to use local TV sets to develop local tourism channel. Develop partnership with trade. Check for funding opportunities to help in the purchase of material (tablets, display units, etc.)	Fred, Council	Fred to get quote for 10 to 15 units, define locations, chase funding	Look for funding with Council: February Ongoing network development
Create online survey to review Wicklow's visitor satisfaction.	Fred	Online survey ready and operational on visitwicklow.ie website. Invite members to have link on their website	March

Failte Ireland / Tourism Ireland / Kildare Failte

Action	Who	Measure of Effectiveness	Time Frame
Identify group from board to attend meeting and lobby Failte Ireland with common objective	Board	Failte Ireland group identified, common objectives and strategy identified.	March
Group to discuss and formulate a plan to encourage tourists off the main route and into the arteries and lesser known areas.	Marketing Group	Design a coordinated plan for the N11 and N81 routes to encourage visitors off the main roads.	TBC
Attend Meeting and lobby Failte Ireland	Failte Ireland Group	Meeting reports	ongoing
Ongoing monitoring of FI and TI campaigns for piggyback opportunities	Failte Ireland Group, Office	List of campaign opportunities	ongoing
Chase and assist trade to create packages to fit Failte Ireland's campaigns and target markets -Special focus on UK £ packages to take advantage of rate difference	Office, Failte Ireland Group	Monthly reminder to trade, monthly supply to Failte Ireland and reminder to feature Wicklow offers	ongoing
Develop Kildare Wicklow destination to fit under FI new South-East Destination, especially along the N11 and N81.	Office - Sub Group -		

Local Infrastructure & Lobbying

Action	Who	Measure of Effectiveness	Time Frame
Councillor on the board of Wicklow Tourism to form a sub Group to look and deal with issues with the local council. Look at opportunities to fast-track tourism decision on infrastructure or signage and encourage a more commercial approach.	Noel	Get chair - organise first meeting - report to board	Feb

Establish system and procedure to receive and deal with incoming issues raised by the trade.	Councillor's Sub Group	System and procedure established	March / April
Regularly inform and Lobby TD's on local issues and opportunities - Create regular scheduled meetings	Board.	Bring feedback to the board, get TD's to attend some meetigns.	ongoing
Establish a network of Local Wicklow Tourism Ambassadors (LTBA). Each LTBA will represent a town of village in Wicklow. He or she will be the official contact to help Wicklow Tourism liaise with local organisations, partners and members. Ideally councillors but also locals. Support local initiatives through WCT activities and promotional platform.	Councillors, Fred	Define and meet with each contact. Keep LTBA regularly informed of actions and activities. Fred to gather regular feedback from LTBA Organise every two month meeting with LTBA for regular updates	set up in March, then ongoing
Councillor's Sub Group to look into opportunities at developing local infrastructures such as walking routes, cycling routes, private parking facilities, etc. Liaise with local organisations such as Co. Co. Coillte, National Parks, CWP, ESB, Upland's Council - Focus on commercially viable opportunities. Special focus to be given to Greenway's such as Blessington Lakes. Developing a network to connect town and villages within Wicklow.	Councillor's Sub Group	Sub group to meet and define opportunity options. Report to Board with ongoing activities	ongoing
Office to conduct a review of how it operates with the objective to improve efficiency especially when it comes to sales and collect membership fees and advertising.	TBD	Create a document to review operation activities, suggest options.	TBC
Transport: Study the opportunity to develop internal transport within Wicklow connecting "Honey Pots" and existing public transport infrastructure along the N11 and N81. Study public / private partnership options with hotels, Guest Houses and taxi's.	TBD	Offer options and suggestions plan.	TBD

Budget & Funding

Action	Who	Measure of Effectiveness	Time Frame
Meet with WCT Board and gain support for lobbying council for a marketing budget.	Fred, Gerard, Noel	Agreement to support proposals.	End of February
Design and cost a proposal for the trade detailing what initiatives will be undertaken in 2015	Fred/Gerard.	plan with costings	February
Identify a list of trade members that would be willing to contribute.	Marketing sub group.	List of potential contributors.	February
Begin approach to trade through series of meetings to look for their financial support.	Fred, Noel,	Objective raise €20,000 from the trade.	March & ongoing
Chase Council for financial support for the above	Fred	Get funding to at least match trade	Feb
Review WCT membership fees and collection	Marketing Sub Group	Introduce simplified payment method, incentive to early payment,	June
Review existing advertising revenue and identify opportunities	Marketing Sub	Maximize income.	May
Negotiate and plan future contribution by County Council for the next three years	Fred, Noel, Board Sub-Group	Increase funding.	September
Discuss options to introduce tax for day visitors to Glendalough, and other areas or optional tourism tax for overnight visitors.	board	options	May / June

Section 10: Suggested Promotional Budget for 2015

PR campaign	€15,000	Twelve Month PR campaign focusing on the domestic market.
PPC and National Digital Marketing Campaign	€5,000	National Digital Marketing campaign focusing on key markets such as walking, golf, gardens etc.
PPC and International Digital Marketing Campaign	€10,000	International Digital Marketing Campaign focusing on the main markets of UK, Mainland Europe and US and on key searches based on Dublin
New Website	€8,0000	
Familiarisation Trip (domestic and International Journals)	€4,000	Familiarisation Trip with International Journalists. Cost for flights etc.
WT Map	€0	
WT Directory	€0	
Trade Shows	€1500	
Information points throughout the county.	€10000	Initial plan is for 10 locations.
Total	**€53,500**	

Wicklow County Tourism is keen to look at various ways and opportunities to finance the above budget. It is expected that the trade will come up with part of that funding as it will be the main benefiter. Wicklow Local Enterprise Office has already committed to €1000 to the development of the new website. It is extremely important that local organisations such as Wicklow County Council, invest in tourism promotional activities in order to support the growth of one of Wicklow's main industry for the benefit of the whole County.